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Joint Standing Committee on Migration

Inquiry into overseas skills recognition, upgrading and licensing

*Report on the recognition process of overseas physiotherapists with
migration purpose*

Emanuela Canini
April 2006

To Dr Habib Vahed

Physiotherapist from Afghanistan

In memory

Murray Bridge(SA) - February 2003

Errata corrige:

Pag. 13

"I have also enclosed a letter from an employer in a hospital in QLD (App. 8)."

Please read:

"I have also enclosed a letter from an employer in a hospital in Ballina Community Health – Northern NSW (App. 8)"

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N.B. All the papers in the appendices can be available in original on request.

Introduction

Overseas physiotherapists are attracted to Australia by the great amount of job proposals and the Government promotion to fill the shortage of skilled professionals especially in the health system.

On arriving in Australia, they find themselves unable to work because their overseas qualification is not recognised by the Physiotherapy Registration Board, even if accepted by Universities to attend a post-graduate Master's Degree.

This prevents them from applying for skilled migration as registration with the professional bodies is essential.

The process for assessment is long, expensive and unfair, so these professionals who decide not to give up immediately find themselves in the offices of the Department of Immigration trying to find a way to stay in the country to complete the procedure for registration.

Let me assure you that there is no suitable visa for the purpose of completing the long and arduous task of registration or for having your skills recognized.

Moreover, these qualified medical professionals are often unable to do other jobs related to the profession, for example as a physiotherapy assistant - because this is missing in the list of the skilled jobs of DIMIA, if not any job at all because they are unable to find a sponsorship without a recognised qualification and also due to the many employment restrictions a possible sponsor has to abide by.

During this time, physiotherapists lose manual skills and knowledge together with a considerable amount of money.

More than that, they lose confidence in their professional capacity because they are considered incompetent and dangerous to the public and confidence in their ability to become integrated in the Australian community because they are "unwanted" as migrants.

My personal experience led to me to share my concerns for such a phenomenon with some colleagues in the same situation, to reveal at the end a national and historical trend not only for overseas physiotherapists who seek for temporary or permanent residence but also for Australian citizens qualified overseas.

I have gathered many of these colleagues in a group to bring this phenomenon to the attention of the appropriate Institutions and also to the media. I have personally conducted investigations and collected information, documents and others' stories and evidence that show the anomalies of the process and the discrepancies in the regulations

of the several Government and private Organisations that do not allow us to prove our skills and this country to fill the shortage of professionals.

You will find in the appendices a file containing my colleagues' depositions (App. 13). Some are in Australia, some are overseas. They are only few of the great number I am in touch with regularly, many of them chose not to participate officially for fear of a blacklist repercussion.

This report has been drawn up considering everybody's opinions and evidence, so to reflect the whole process in a national and worldwide picture.

My sole aim is to provide the Committee with enough information so it can be able to work out a better approach to migration of skilled people, to have a better cost-effective process for both, and finally a better integration of overseas professionals in the Australian community that certainly at this stage is suffering from the lack of labour force, especially in the health system.

I strongly trust the Committee to read carefully this report as it contains important and useful data that will allow a clear view of the condition migrant physiotherapists put up with in Australia. Especially, I hope the Committee will consider my suggestions and requests to be helpful to the improvement of the procedure, and applicable in short time to give overseas physiotherapists their professional dignity back.

My voice is the voice of hundreds of physiotherapists that are experiencing this situation, now and in the past. We all thank the Committee to have given us this opportunity to contribute to the growth of this country.

Personal experience

- Emanuela Canini, over 30s, qualified in Italy in 1995 as a physiotherapist with a 3year-full time-course, several post-qualification courses (including some Australian techniques), 8year-work experience, very good level of English (IELTS overall score 7 at the end of 2003).
- Jan 2004: Arrival in Australia with a student visa to attend a post-graduate Master of Sports Physiotherapy at Curtin University of Technology in Perth, thinking WA Registration Board recognises Master of Physiotherapy for full registration as cited on their website. My purpose is to be granted permanent residence on the base of my skills.
- After a couple of months I discover that “Master of Physiotherapy” does not mean any type of Master related to Physiotherapy but it is basically a two year-course offered to people holding a Bachelor in a related profession that can become physiotherapist and obtain registration.
- My enquiry to WA Board about the value given to a Master of Sports Physiotherapy after having insisted in getting an answer, ends with the promise to have my case discussed in their next board meeting. After some time a letter informs me simply that the outcome of the meeting says the Master of Sports Physiotherapy is not recognised for full registration. No particular reasons are mentioned (Appendix 1). To notice that the Head of the Physio School at Curtin is also a member of the Board. I have recently requested the minutes of the meeting. I have been told they are not available to the public, but I can apply with the Freedom of Information Act, which I will do.
- Too late for pulling out from the course, I complete the Master of Sports at the end of 2004. Cost over 20,000\$ plus cost of living. To notice the course in conjunction with the Master of Manipulative Therapy is attended by over 26 students: 21 full time overseas students from all over the world, and only 5 part time Australian students.
- I apply for eligibility for the procedure of recognition with Acopra, the organisation officially accredited. Cost 495\$, plus IELTS English test about 250\$ and cost of translation and certified true copies of documents in Italy over 1,000\$.

- I enroll for the first written exam due in March 2005. Cost 1,100\$. Because Acopra provided candidates with the list of their email addresses, I get in touch with a colleague in Perth and we study together. He is at his 3rd attempt and his story and other rumours are quite discouraging, as it looks that almost no-one can clear the procedure at first attempt so protracting the time largely over a year.
- In spite of the lack of resources and indications about the exam provided by Acopra, I manage to study at my best with the help of that “experienced” physio. Unfortunately after more than 6 week-waiting, results say I have failed the exam, missing the pass mark only for 4 questions. Very vague feedback is given on the phone about that, not even knowing what the pass mark was.
- In the meantime I apply for a sponsorship with an employer. After having applied firstly with the Employer Nomination Scheme to employ me as a physiotherapist, because unable to get registration after the Master, he decides to sponsor me as a massage therapist, position also needed in his clinic, with a Temporary Business Long Stay visa 457. Xrays and medical examination are required, with related cost. The visa is approved but soon after the employer decides to withdraw the sponsorship and I have communication by DIMIA that my visa would have been cancelled (Feb 2005). No refund given for both applications. I have never started to work for that employer.
- I re-enroll for a second written exam. Other 1,100\$. Because Acopra provides written exams only twice a year, I try to avoid cancellation of the visa, looking for other jobs but unsuccessfully. No employers are available to give me a job as a masseuse with a min 35hrs/p.w. and/or 39,100\$ min gross salary. Most of the proposals involve part time jobs and payment on percentage. Although plenty of these type of jobs, DIMIA does not accept more than one employer as a sponsor.
- June 2005, still waiting for my visa cancellation. Worried, I contact DIMIA and apparently the withdrawal of the sponsorship has not been recorded yet.
- Luckily an Italian nursing home looking for an Italian speaking physiotherapy assistant decides to sponsor me with an Occupational Trainee Visa. The contract is supposed to end in September 2005, but in October the application is still under process. Eventually the application fails, not only because the time of the contract has gone but also because the nursing home is not able to provide the training/employment plan as at their first experience of training/sponsorship. DIMIA advices to withdraw the application to avoid a refusal. No refund.

- I sit the second attempt of the exam in September 2005. The level of the test is unrealistic, not related to daily physiotherapy practice, also with questions misleading and confusing even for English mother-tongue candidates, and I find myself having to guess most of the answers. About six weeks waiting to discover another fail together with 86% of the candidates (App. 2). We realise the process is unfair and decide to start an official group protest. I collect enough evidence to show what goes on behind the scenes. Several Institutions are contacted and the newspaper The Sunday Times agrees to publish our story (issued 27/11/05).
- My visa is going to be cancelled soon and I go to ask for one more week time to find a sponsorship. While speaking to the officer at migration office, I notice on the counter some bags they are giving for free: on top written "Australia needs skills".
- During the same days, I also attend an expo in Perth in November 2005, organised by DIMIA to encourage skilled migration. By chance, I meet there a representative of WA Department of Health, she was promoting migration for health professionals and was absolutely unaware of the difficulties in the recognition process. I explained my situation so that I had the Department investigating on the procedure in WA.
- The extra week is granted and luckily I can apply for a Temporary Business Long Stay 457 visa with a contract with Royal Perth Hospital as a physiotherapist assistant (App. 3). Other Xrays and medical exams, other costs. Old Xrays are still valid, but I am required to do them again. Reason/nonsense: "because the position requires also blood tests". The Department of Health helps me with the procedure. The hospital makes pressure to have me to work soon as the vacant position causes inconvenience but the time to process the papers by DIMIA is too long. Ready to work, trained, provided with the equipment and done the induction course, the day before starting to work, DIMIA calls the hospital and the Department of Health advising to withdraw the application to avoid a refusal as "physio assistant" does not appear in the list of DIMIA skilled jobs. No refund of course.
- Dec 2005: Contacted MP Don Randall, through information and contact details given by Ombudsman, I manage to have a tourist visa for three months so that I can sit the exam for a 3rd time. Other 1,100\$. I sit the exam in March 2006.
- When my visa approaches again to an end, I have a chance to be trained by Royal Perth Hospital as a physiotherapist not only to help me with the clinical exam, which is the step after clearing the written exam, but the hospital is also interested

in employing me as a physio once I get registered. The Occupational Trainee is the suitable visa. Don Randall and the same DIMIA follow the case. Eventually I find impossible to apply, as every hospital requires a professional insurance, which is given only to people with temporary registration, which in WA is available only to candidates who have officially cleared the written exam, so not before the 6week-waiting after being assigned an official placement and an official supervisor by Acopra.

- Luckily I am granted other three months as a tourist to be able to get my exam results.
- In the meantime, InMotion, Australian Physiotherapy Association's magazine publishes an article in March 2006, describing the candidates that failed September exam as incompetent and dangerous for the public, definitely not being at the same level of the Australian graduated students (App. 4). I write a complaint letter to the editor, the APA and Acopra, concerned about the bad image the article gives about us to the possible future employers once we clear the whole procedure, preventing us from being selected for a job. I ask to have my letter published to tell our version. No reply yet.
- Next step will be obtaining a working or training visa, completing a six week placement in a hospital organised by Acopra, cost around 2,500\$ (not mentioned in Acopra information), sit the clinical exam, cost 1,700\$ and be finally registered.

Anomalies and discrepancies in the process – The role of the several Government Departments and Professional Organisations

Registration process and the Physiotherapy Registration Boards

Criteria for registration are different in several States of Australia.

Full registration

All the Boards recognise Australian qualifications through Mutual Recognition. All the Boards recognise also qualifications from New Zealand through the Trans Tasmanian Act (WA introduced it only last year).

Interestingly, WA Board recognises Canadian qualifications.

Temporary registration for employment purpose

It is at the discretion of the Boards and the papers of the applicants must be assessed to meet the minimum requirements. Practice must be supervised and the employer/supervisor must meet some requirements, though I believe that supervision is what any ethically correct employer would use as being responsible for public health, even on full registered employees, of every nationality.

Working-holiday makers can make use of it usually for 12 months, changing employer every three months according to the visa requirements and re-applying again with the new employer for another temporary registration.

Eligible overseas physiotherapists for temporary registration:

Tasmania: working-holiday makers only if from UK, Ireland, South Africa, Canada. All the others are required to get a sponsoring employer physiotherapist.

Victoria: all overseas physios for a not specified time.

South Australia: working-holiday makers for a short period and approved overseas employment exchange programs. The whole thing has to be arranged with the Board, there are not specified parameters.

NSW: working-holiday makers for a year and exchange program workers.

NT: physiotherapists qualified in UK, Ireland and Canada can be eligible for temporary registration (2004 data).

WA and QLD: do not give any temporary registration for employment purpose.

No regulations are specified for permanent residents or Australian citizens qualified overseas, but it appears that they are not eligible to any temporary registrations of the above, as showed in the letter of a permanent resident in NSW qualified in India that with a job offer has been denied temporary registration (App. 5).

The anomalies:

The Australian Physiotherapy Competency Standards have been established and meant to be the same all over the country. Issues arising from these data:

- **Canadians meet the standards in WA but not in the other States**
- **A permanent resident or an Australian citizen has less rights than a temporary visa holder**
- **In WA and QLD a supervised practice can be obtained only in a full time international fee paid Master at University**
- **After 365 day-work an overseas physiotherapist is back to be considered dangerous for the public.**

Australian Universities and their courses

A considerable number of the overseas physiotherapists that apply for the procedure of recognition have completed a post-graduate Master in an Australian University, but still they are unable to clear the process at first attempt and in the time expected. It is hard to believe that an exam set to reflect the graduating knowledge of physiotherapists can not be passed by successful graduates of an Australian Master of Physiotherapy.

These applicants have a Degree of Physiotherapy that is recognized by the Australian University they studied at, but on the other hand it is not recognised for registration.

The Heads of the Schools are also members of the Boards.

Masters are attended mainly by overseas students, paying 30% extra fee compared to an Australian student, what will happen if Universities would not accept overseas Physiotherapists? They would discontinue the courses.

In the hearing with the House of Representatives March 2003 with the Standing Committee on Ageing (www.aph.gov.au/hansard/rep/committee/R6337.pdf , p.324) following the question from a Member of the Parliament if it should be the case to encourage more physios to be trained to compensate for the shortage of professionals in the country, the APA (Australian Physiotherapy Association) Executive Officer - Mr Malone replies that the lack of physios is a huge issue and it is a top priority of the Boards Directors. For the occasion Mr. Malone went to a meeting in Newcastle a week before the hearing (March 2003), where the Heads of the Physio Schools confirmed the issue was high in their agenda.

Amazing that only some months later, Newcastle University declares that physiotherapy course will be harder to get into together with the fact that cut-offs will be slightly higher because the demand just goes up every year as detailed by the ABC news, 19/12/03, www.abc.net.au/news/newsitems/200312/s1013261.htm .

APA (Australian Physiotherapy Association) and its position

The APA report, dated May 2005, expresses concern about the procedure of assessment that does not allow to fill the shortage of Physiotherapists in Australia:

“The APA is concerned that current examination requirements for overseas-trained practitioners are a disincentive for ‘working holiday’ Physiotherapists. Limited registration has been introduced in many jurisdictions but it is unavailable in Queensland and Western Australia. Where it has been introduced, there are indications that problems may arise at the end of limited registration. For example, a practice in one State has employed a UK trained Physiotherapist for nearly 12 months. At the end of the 12 months limited registration will expire. The practice is happy with the Physiotherapist and has asked the Physiotherapists’ Registration Board how at 365 days the Physiotherapist can be deemed competent to practise and at 366 days no longer be able to practise.

Where limited registration is unavailable, the applicant must complete a three-stage assessment process before being able to register. This involves assessment of qualifications, a written examination and a clinical examination. Obviously this is impractical for holidaymakers. Protection of the public is of paramount importance but presumably what is safe in one jurisdiction is safe in another. The APA strongly supports a nationally consistent approach to the assessment of overseas-trained Physiotherapists for both permanent and holiday employment.”

(www.apa.advsol.com.au/independent/documents/submissions/ProductivityCommissionSubmissionMay05.pdf , p.20).

It’s interesting to notice that the main concern of the paragraph in the report is about temporary workers.

I have tried to contact APA, and so have my colleagues in the other States to try and form a group for seeking for advice and opinions. I have not heard back from anyone and my surprise ceased when I saw that the Director of APA is also a Director of Acopra.

In March 2006, the APA magazine InMotion publishes an article “Low pass rate causes frustration”, referred to the group of overseas physiotherapists (86% of the total including myself) that failed last September 2005 written exam provided by Acopra for the recognition of their overseas qualifications (App. 4). The article gives a bad image of us threatening our opportunities for a future employment even after successfully completing the procedure of recognition.

I wrote a letter of complaint to the Editor, the Boards and Acopra (App. 6), so did other colleagues, including some “frustrated” working with temporary registration and members of APA themselves (App. 7). I asked to have it published as for equal opportunity we have the right to tell our version. No reply to me to 10th April.

I have also enclosed a letter from an employer in a hospital in QLD (App. 8).

Department of Education, Science and Training (DEST) and its role

As from the submission to this Committee on July 2005 (<http://www.aph.gov.au/house/committee/mig/recognition/subs/sub091.pdf>) DEST states that

“...contributes by ensuring the processes for skills recognition are in place and do not cause undue delays to the processing of migrant applications. DEST’s primary contribution is to facilitate the recognition of overseas professionals skills through: approving assessing authorities which assess the skills of professionals (like Acopra) and providing a qualification recognition service.

...The approval process is designed to ensure that the nominated professional body has the capacity to deliver effective professional qualification assessment that is consistent with Australia’s quality and standards and labour market interests.”

Is DEST effectively continuing its role of inspector to ensure Acopra is following the guidelines for a correct assessment?

DEST can assess itself qualifications through its Overseas Qualification Unit. The assessment is not suitable for migration purpose but only for employment. It is possible for physiotherapists to submit their overseas qualifications and obtain after a 50\$ fee a comparative assessment to an Australian Bachelor degree.

The Overseas Qualification Unit consults the National Academic Recognition Information Centre for the United Kingdom. If a qualification is considered comparable to a British Bachelor (Honours) degree, then it is also comparable to an Australian Bachelor degree.

There is evidence (App. 9) that a DEST declaration of a comparable qualification is not accepted even for employment purpose, as it is not accepted by the Physiotherapy Board. Of course, it is also known that even a British has to go through Acopra process of recognition.

What is then the real role of the Department of Education in this procedure?

Department of Immigration (DIMIA) and its mis/contribution to the process

Recognition procedure consists of a written exam and a clinical exam. The written exam is provided also in some cities overseas while the clinical exam with the six week-clinical placement is compulsory in Australia. Of course, though overseas physiotherapists have the opportunity to sit the first exam in other locations closer to their residential country, most of them choose to move to Australia, which is required anyway for the second exam.

Getting a contact with the Australian health system prior to the exam is certainly convenient for candidates, who want to experiment and verify their knowledge in relation to the Australian physiotherapy standard through training or work. Moreover, it is surely useful to gather with other candidates to form study groups, to access resources, and to compensate for the lack of guidelines given about the exam.

Once candidates are in the country with considerable financial investment, they expect to stay for the whole time required by the procedure, which is minimum almost a year, provided to pass every exam at first attempt. However many candidates found themselves to fail more than once extending the time of stay.

In both cases, overseas physiotherapists have considerable issues with DIMIA, not only to stay in the country but also to obtain a working or training permission to keep their skills active till registration is gained.

While permanent visas (Skilled Independent and Employer Nomination Scheme) are not available without registration with the Board, there is a number of temporary visas which candidates can officially use, but each of them presents some hurdles.

The possible temporary visas currently available are:

- **Working/holiday:** mainly used by young physiotherapists because it is available only to under 30 years old applicants, and it is probably the easiest visa to obtain. Moreover in all States but WA and QLD, they can have temporary registration with the Board without any assessment through examination for the visa limited time.

Usually, these visa holders do not have intention to settle in the country, but their only purpose is to improve their skills in physiotherapy joining the pleasure of a holiday.

This visa involves also changing employer every three months. It is evident that it is not a sufficient time to gain confidence of colleagues and patients of the facility employing, not to mention that as soon as the employees acquire the work

routine and can give their best, they have to change employer.

- **Temporary Business Long Stay 457:** through a sponsorship, overseas physiotherapists, who can not be registered temporary, can find their way to work in a field related to physiotherapy. You will agree that an experienced physiotherapist can hardly have other types of qualifications and work experience to be able to find a sponsorship in another field.

The only two jobs a non recognised physio can do are: massage therapy and physiotherapy assistance. Given that employees are not usually inclined to wait for time of approval of the application, too long for their needs, nor to disclose their business papers to DIMIA, let's see the chances to get an employment with those two types of position.

As a massage therapist, the vacant positions on offer can not guarantee the minimum hours worked according to the visa (35hrs/p.w.) nor the minimum salary threshold (39,100\$p.a.). Massueses are usually required to built up their own clients and are paid on percentage, not to mention that is not advisable or healthy to work for that weekly amount of time as it is a physical wearing activity. In spite of this, there is plenty of offers of part time jobs, but the visa conditions request the applicant to have only one employer.

As a physiotherapy assistant, there are certainly more chances to find a full time-on wage-position especially in hospitals or in aged care facilities. Unfortunately, 457 visa can be granted only to sponsorship regarding jobs appearing in DIMIA's skills list. This list includes 528 skills of every kind, from chemist to piano tuner, from engineer to horse or dog racing official.

Physio assistant does not appear on the list so any visa application to DIMIA for that position is refused, unless the job is in a regional area. To notice that the option "regional area – list requirement waiver" is not mentioned in the information provided by DIMIA website nor in the appropriate booklet.

Regional areas, unless reasonably close to the metropolitan area, make difficult for the exam candidate to form study groups, to access enough resources to study, plus all the social and facilities inconvenience of daily life in the country as for which even the Australian citizens would rather work in the city.

- **Occupational trainee visa:** a candidate can be trained/employed as a physiotherapist in a facility that is approved and holds training programs, usually only hospitals already acting as clinical placements for Australian Universities students. Private business, nursing homes and other facilities usually can not provide this service.

Because of the shortage of physiotherapists in Australia, some hospitals are happy to offer unpaid training based on work after the candidate has cleared the written

exam, so that the trainee can practise to sit the clinical exam and complete the procedure of recognition, and the hospital has a potential new employee as soon as gained registration.

Unfortunately, professional insurance is needed even for training, but this is provided only to temporary or full registration holders. Temporary registration in WA and QLD is granted only after having passed the written examination and assigned an official placement and supervisor by Acopra, which is not necessarily the hospital offering the position.

- **Student visa:** international students are required to be enrolled in a full time course with compulsory attendance. It would be impossible for the student to complete the 6week-placement at the same time, not to mention the double study committment.
- **Visitor visa and Short Stay Business Visa:** they are not suitable to attend the six week-placement in the hospital.

As you can see, in spite of the wide range of visa proposed, the restrictions applied on each of them do not allow the candidate to complete the procedure of recognition in a reasonable way and time, unless he or she is an Australian citizen or a temporary or pemanent resident through a spouse/de facto visa.

Once overseas physiotherapists complete the procedure only then they can apply for permanent residence through an Independent Skilled or Employer Nomination Scheme Visa. Both these type of visas require recent work experience, which is usually threatened by the loss of skills and the impossibility to practise as a physiotherapist.

It might be useful to spend also some words about the organisation and the position of DIMIA as it appears from the applicant view.

DIMIA is very sparing with providing information. I appreciate that DIMIA's task is not advising applicants on the more suitable visa for their needs (though I wonder why not). Mainly the information provided are limited to the number of booklet regarding the visa the applicant is enquiring about.

These booklets are often missing or misleading important information, examples:

- Temporary Business Long Stay 457 (Booklet 11): as said before, the option "regional area/skills' list waiver";
- Employer Nomination Scheme (Booklet 5): sponsorship requires a full time three year-contract. This is a disincentive for employers, as the three year-term is a scaring committment, not knowing instead that they are not obliged to abide by the rule, nor the visa applicant has to. This information is not available to the public.

- Occupational Trainee: the training based on work can be also unpaid, though DIMIA website specifies the trainee must be employed “*under Australian industrial relations law and relevant Commonwealth, State or Territory awards and conditions for the industry*” (<http://www.dimia.gov.au/allforms/otv/01.htm>), which leads to understand that the training must be paid.

Moreover, the applicants have to keep themselves up to date, as the migration legislation process is in continuous development and it can be even possible that an applicant after having invested all his or her efforts towards a type of visa, eventually can not apply anymore. Many then prefer to rely on migration agents with further expenses.

Acopra and the process of recognition

The examination is said to be based on the Australian Physiotherapy Competency Standards, that are currently under review, for which Acopra has contracted, for 119,780\$, PPR Consulting Pty Ltd, a very successful group specialised in providing policy, planning and review (from Acopra 2005 Financial report – available at ASIC Australian Securities & Investments Commission).

The process of recognition requires three steps: eligibility, written examination and a clinical exam after a recommended six week-placement. Details have been already provided by Acopra through their previous submission to this Committee. This paragraph will limit to question the several parameters of the procedure.

Cost of the procedure

The cost of the process is approximately 6,000\$ (including the clinical placement), plus repayment of the fee of the exam failed. I strongly believe this is excessive.

According to Department of Education, Science and Training (DEST) "the costs of assessment to clients should be determined on a not-profit cost-recovery basis" (DEST submission no.91 to the Committee, <http://www.aph.gov.au/house/committee/mig/recognition/subs/sub091.pdf> , p.20).

Acopra is registered as a charitable organisation, with GST concession, FBR rebate and income tax exemption ([http://www.abr.business.gov.au/\(wwxo15551acxp1r0txzwc55\)/search.aspx?SearchText=28108663896&StartSearch=True](http://www.abr.business.gov.au/(wwxo15551acxp1r0txzwc55)/search.aspx?SearchText=28108663896&StartSearch=True)). I suppose any organisation considered as charitable by the taxation office has to provide the reason for the charity.

What charity is Acopra doing and who to? The taxation office told me not to have that information.

From Acopra's 2005 financial report (available at ASIC – Australian Securities & Investments Commission), it appears that in spite of the considerable revenue, at the end the profit is just 3,774\$, so demonstrating they abide by the rules as charitable. To notice though, that Acopra has other activities and the not-profit final value is not just the result of the assessment of overseas physiotherapists based on cost recovery.

In 2005 the income from the exams was about 400,000\$. Plus there were donations for about 500,000\$ and total assets for over 600,000\$.

The donations received by Acopra are probably the grants coming every year from the Registration Boards as it appears from several Boards' financials (see examples www.physioboard.qld.gov.au/DocsLibrary/Physio%20Annual%20Report%202003-

04.pdf , p.12; www.physioreg.health.nsw.gov.au/hprb/physio_web/pdf/physar01.pdf, p.8). Of the annual registration fee, that every Australian physiotherapist pays to the Board, about 4\$ are transferred to Acopra. The Board grants are stated to cover the cost of the other activities above mentioned.

How can a charitable organisation charge and have assets? Is it like going to feed the homeless and then give them a cost-recovery bill? That would be “not-profit” but not “charitable”.

The written exam consists of 20 cases with related multiple choice questions. Every case is an intellectual property valued 200\$ as stated by Acopra (App.10), for a total of 4,000\$. The written exam is provided twice a year and it is the same all over the world and apparently, the questions are recycled in several exams, so eventually the effective value of the intellectual property is certainly less in reality.

The clinical placement, including professional insurance, indemnity and temporary registration, costs about 2,000-2,500\$ depending on the hospital charging. At their say, it is the only way to obtain an appropriate supervision and to have the placement organised in a short time.

The placement is a six week full time-attendance in a hospital, where the candidate expects to be guided in the process of learning or verifying the Australian standard procedures in assessing and treating patients with different pathologies.

Being essential for candidates, especially if never being in contact with physiotherapy in Australia, to assure them a pass for the clinical exam, the placement though just recommended, becomes “compulsory”.

However, the cost is not mentioned in the initial information given by Acopra as also through all the process, till eventually the candidate clears the written exam.

Acopra states not being involved in these arrangements. Well, I think it should be instead, because the clinical exam has a cost of 1,700\$ to the candidate and I believe there is plenty to conduct an exam, which involves the presence of an examiner for three hours and three patients picked in a hospital. So maybe, Acopra should organise a proper supervised placement at no extra cost.

So, in light of the facts, did the 400,000\$ cover their costs enough?

The fact that Acopra mentions the fees are comparable to Dental \$5,210 and Pharmacy \$3,500 does not represent a justification, indeed it is further evidence that the whole system needs to be investigated.

Time for the process to be completed

Almost one year, providing to pass all the exams at first attempt. As overall, nearly a year is needed for a MCQs test, six week-placement and a clinical exam. If the candidate fails the written exam then an extra six month-waiting is needed for another attempt.

The more evident time wasting is the six to eight weeks to know the result of the MCQs test through a computer and the two months to have the clinical placement organised to start.

Often time is the main enemy of a migrant. In all this time the physiotherapist has to deal with visa extension, financial issues, loss of practice and manual skills.

The exam

The written exam (Multiple Choice Questions Test) is the main hurdle to the completion of the procedure. In spite of the fact Acopra presented their 2005 data with its submission to this Committee as to show that most of the candidates pass the written exam at first attempt, this is not what happens in reality.

First of all, those data are not correct. The Italian physiotherapist in QLD listed did the written exam three times and not two as written. The Indian physiotherapist in WA I studied with did the exam three times and he is not listed at all. They both cleared the procedure in 2005. I could not be able to verify the other data for the moment.

Moreover, those data represent the 59 out of 102 candidates that completed the clinical exam in 2005. It would have been interesting if Acopra would have showed also the other 43 candidates' data, the ones that failed the clinical exam.

In spite of the claimed average pass rate (around 50%, and only last March '05 around 60%), it appears that many of the lucky 50% passing candidates are still the physiotherapists having tried the exam more than once.

Last September exam that had a fail rate of 86% was just the last straw. I do not want to believe that it was set in such a way to compensate March '05 high pass rate.

We would like to raise a number of issues regarding the examination and the procedure Acopra undertakes that makes this examination almost impossible to pass. These in general regard:

- **Preparation offered and level of difficulty of the exam**
Weak, unsatisfactory guidelines and resources, inconsiderable amount of reading time allocated for the examination. There is very high standard of specific

questions above new graduate level. This includes confusing multiple choice questions. In some cases the “most correct answer” will suffice.

Acopra states that it provides a general study list, then they ask specific questions that are in no way considered to be general knowledge. How is this compatible? It seems that the MCQs often do not relate to the given case study, and that makes it impossible to use the given information of the case study to answer the question through physiotherapeutic reasoning.

The ultimate goal for a valid assessment of clinical competence is to test what the physiotherapist actually does in the work place, but this is not the case. The journalist of The Sunday Times went to test experienced physiotherapists with the sample MCQs provided by Acopra on their website and most of them could not answer. That sample, which is the only one Acopra provided for years, is much easier than the real exam.

Acopra states the level of the exam reflects the standard expected of Australian students graduating from final year of their physiotherapy education programme. Acopra has never tested the exam on those students, so we do not see how they can assert that.

The lack of consistency in responses to questions in September exam is used to support the fact that questions were set at a correct level. However in speaking to a number of candidates following the exam, the common response is that candidates were forced to guess the answers to a number of questions, which I am sure you will agree is unlikely to give consistent results.

Only after September exam, they declared they would have proposed the whole test planned for March '06 to some students to verify their response to that. We do not know, of course, the result of that experiment, and it would be interesting to have some data.

- **Poor feedback after examination.**

In most cases the responses from Acopra have been of a “politically correct” nature. Following our protest after September big fail, we managed to obtain the exam papers back to check the answers, while in the past we were allowed to get only the number of correct answers for each case (example: Paper 1: Case 1: 35 year old man with asthma – 1/6 ; Case 2: 70 year old man with repair of abdominal aortic aneurysm – 3/6, etc., App.11), which is not an appropriate feedback to prepare the next attempt.

Those papers are copyrighted as they are intellectual property and it is common use in Australia not to share the exam papers according to them. We had to sign a disclaimer to have them, so that we can not show them to anyone but candidates' study groups (App.12).

- **Pass mark not stated to candidates prior to the examination.**

It would seem that Acopra is using this system of moving the pass mark to effectively limit the number of successful applicants through each round of the examination process.

Is Acopra setting the exam to test the knowledge of the applicants or setting simply the number of passes?

Acopra is not following Department of Education, Science and Training (DEST) criteria, as it says it should be an "easily understood, equitable and transparent process". Well it is not. Why can't we know the exam pass mark before the exam? Why does it have to change accordingly to how many candidates do well or bad? Why can't I see my papers and the test after the exam?

Conclusion: safety issue or protectionism?

In spite of the shortage of physiotherapists in Australia, the standard should not be lowered as a quick fix of the workforce crisis, says Acopra, APA and the Boards. Public safety is paramount.

We are labelled as incompetent professionals because we can not pass an exam which we consider totally inappropriate to assess the skills of a physiotherapist.

- In the APA report May 2005 (<http://apa.advsol.com.au/independent/documents/submissions/ProductivityCommissionSubmissionMay05.pdf>): APA is concerned that Aecop procedure is a disincentive for “working holiday” physiotherapists. These physiotherapists work for about 12 months without any assessment and at the end of the “holiday” they go back to their countries, leaving the position to another holiday maker or just vacant.
- In the hearing with the House of Representatives March 2003 with the Standing Committee on Ageing (www.aph.gov.au/hansard/rep/committee/R6337.pdf , p.323-4) : APA President Ms Nall underlines the importance of the physiotherapy assistants that under the direction of the physiotherapists do the work and it reveals to be a very cost-effective intervention. I have certainly seen assistants doing physios’ job and I agree that is very convenient.
- In the same hearing: Ms Nall’s words *“Given that our students have to hit the ground running – we don’t have an intern year; they are registered at the completion of their course – we have to make sure that people are safe before they are let loose on the public. A lot of one-on-one intervention is required. For example, physiotherapy gets about two-thirds of the funding that medicine gets, yet medicine has an intern year, as you know, and that is where new graduates really start to learn procedures; whereas ours have all had to learn their procedures.”* (p.324).
 - Holiday makers not assessed?
 - Physio Assistants?
 - New graduates that don’t know the procedures?

Are we talking about safety issues or is there an actual effort to fill the shortage of professionals or is it just blatant protectionism?

I am not talking about protectionism towards overseas migrants, sometimes I have the impression that this is extended even to Australians and not just because the exams see failing also Australians qualified overseas.

If Acopra continues to set exams of this nature it will surely guarantee that Australian physiotherapists will be in high demand and earn a high rate of pay and enjoy the benefits of a closed market place, where all of the physiotherapists are trained through Australian Universities. However, it will close an opportunity to learn new techniques and knowledge learnt from overseas in a practical way from foreign physiotherapists.

A possible solution

The following is what I believe might be a valid assessment of clinical competence for a professional as it tests what the physiotherapist actually does in the work place.

ASSESSMENT THROUGH TRAINING IN HOSPITALS:

- Public hospitals set a number of positions (in relation to the local shortage) and an approved training program made available for overseas physiotherapists seeking for recognition.
- The candidates are required to apply for a full time training position, providing they hold the minimum requirements (such as three year-full time-course recognised in their own country), selected in relation to their curriculum (postgraduate courses and work experience) and their English if not first language spoken.
- The unsuccessful applicants can make use of degree conversion programs or bridging courses at Universities, or re-try after having gained the missing requirements.
- Applications for the position in the hospitals can be lodged onshore or offshore. In both cases, the candidates selected must be guaranteed a visa that allows them to stay or to enter the country for the period required, plus temporary registration with the Board.
- The clinical placement consists of three months (for example) of supervised practice in the main physiotherapy areas (neurology, cardiorespiratory, orthopedy and outpatients), and they are constantly assessed by the supervisor through continous feedback. The candidates are provided with specific guidelines about the exam and access to study material.
- At the end of the three months, the candidates sit a practical exam that reflects the training provided in the same hospital, assessed by the supervisor, a representative of the Registration Board and a representative of the Department of Health. If successful, the candidates obtain full registration. If unsuccessful, a further placement can be considered to improve the knowlege in the area required.

ADVANTAGES:

1. Hospitals can fill the shortage of physiotherapists at no cost.
2. No significant rate of exam fails.
3. The Boards can deal with the process locally with subsequent abolition of Acopra as assessor of overseas physiotherapists.
4. Resolve issues quickly due to tighter communication between examiners and Registration Boards.
5. No time wasting for the physiotherapist and especially no loss of practice and manual skills.
6. Better prepared and monitored physiotherapists with advantage of the Australian community and its safety.
7. More opportunities for the trained physiotherapist to get full employment, even within the same hospital, as already integrated in the Australian Health System and physiotherapy environment.
8. No visa issues to solve.

Requests

I would like to conclude this report with some requests that we feel to be urgent to establish a fair system towards professionals offering their skills and at the same time convenient for the country to increase its work force:

1. Same registration criteria for every Board all over Australia
2. No discrepancies between Registration Boards and Universities
3. Establishment of a Skill Recognition Visa
4. Reasonable time of approval for applications by DIMIA to avoid employers being discouraged to offer sponsorships
5. Inclusion of "physiotherapy assistant" in DIMIA's skills list
6. More consideration for over 30 years old migrant professionals as they are certainly more experienced and capable
7. Collaboration and information exchange among the several Government Departments and the professional organisations, so that each of them is aware of the requirements needed in all the aspects of a skilled migration process
8. Full information in details about the process provided before skilled migrants decide to leave their own countries (for example during expos organised by DIMIA overseas, or through internet by the professional organisations)

And especially:

9. Respect for professionals that are offering their skills and awareness that, in spite of Acopra negative criticism about physiotherapy in the rest of the world, overseas trained physiotherapists can bring different knowledge and different techniques and enrich further more the standard of the Australian physiotherapy and all the community can take advantage of that.

Your sincerely

Emanuela Canini

