

**Work plan for Meeting Three of FWG (23 March 2007)**

**Suggested Structures, Procedures & Processes of PSBs**

**For consideration and response**

**Plus**

**Consideration of Fee Levels for Registration**

Note – the structure and processes of the PSBs will depend, in part, on the agreed roles of the PSBs. This is because the responses to the Work Plan for the 2<sup>nd</sup> FWG meeting included opposing suggestions concerning the roles of the PSBs and FRC, namely that;

- The FRC be solely responsible for Registration of Applicants and Validation of Applicants Evidence or alternatively
- That the PSBs exclusively have this function or
- A combination of these approaches.

Therefore, at this stage, consideration needs to be given to both possibilities and the respective impact each possibility has on the structure and working processes of the PSBs.

*Note – Once the PSBs and FRC are formally in operation, it is envisaged that there will be an initial influx of applications for registration from practitioners. The bulk of these initial applications are most likely to come from those practitioners who are already members of Professional Associations. It is likely that the first 3 to 6 months will be the labour intensive period for the registration and validation of evidence of these applicants. Thereafter, it is envisaged that the workload will become less and will also involve a greater percentage of ongoing applications from those practitioners who are not already members of Professional Associations. Therefore, a distinction has been proposed which reflects this initial, heavier workload period which is hereafter referred to as the “Transitional Period”.*

Consideration of the possible Roles of the PSBs/FRC in relation to Registration and also Validation of Evidence (hereafter VE) is considered in Part Two of this document however, to start with, consideration is given in Part One to the possible Structure of the PSBs. The suggestions re the possible structures do take into account the different possibilities concerning the Roles of the PSBs/FRC re Registration/VE.

**Part One**

**Options for the STRUCTURE of PSBs (taking into account the above possibilities):**

It has been agreed by the FWG that the PSBs will have the roles of recommending the various Profession Specific Standards (PSS) for matters such as Education & Training, Grandparenting, CPD, Revalidation etc.

Some of the work in these areas will, it is envisaged, be moved forward by the work currently being done by the respective Regulatory Working Groups (RWG's). It is further envisaged that this work will run in tandem with the work of the FWG over the seven months to September 2007 before, where necessary, being finalised by the PSBs.

It is therefore hoped that the PSS will be wholly or mostly in place either by the end of September or the end of the year. As such, it is likely that the PSBs, after the initial work of defining and recommending PSS is completed, would need to meet infrequently, possibly quarterly during the first year of operation of the Regulatory Body (or less) and then twice yearly (*x ref budget*).

However, as has been proposed below, one possible role of the PSBs may be involvement (to varying degrees) in the process of Registration of applicants and VE in areas such as Education & Training, Revalidation, Grandparenting, CPD etc. This possible role may also be an ongoing one or one that is carried out during the early life of the Regulatory body when the level of applications for registration may be highest.

With either scenario in mind (the PSBs having the role of PSS alone or plus Registration and VE) it is likely that the actual structure of the PSBs would not need to be different, although the processes adopted may need to be.

### **Proposed Structure of PSBs**

The PSB would be a part of the Regulatory body and would be a Board that would likely be structured as follows;

#### **A. Numbers**

An uneven number of members, one of which would be a Lay Chair. For example;

- Three or
- Five members - including a Lay Chair.

#### **B. Appointment**

The members, aside from an elected Lay Chair, would either be;

- elected or
- appointed

#### **C. Source of members**

Members appointed or elected from either;

- the membership of the Professional Associations/Educational Training providers for the respective Profession or
- from Practitioners (i.e. not restricted to those who were members of Professional Associations) or
- a combination of the above

Each member, as a prerequisite, would need to be a member of the Federal Register.

#### **D. Officer status**

The members would likely be considered as Officers of the Regulatory body, as this would offer, as appropriate, liability cover under say Directors & Officers insurance cover.

E. Form

It is unlikely that the PSB would have any form of constitution, as it would legally be considered a part of the Regulatory body. Its working procedures and processes would therefore be decided by the FWG and regulated by the FRC.

F. Term

It is proposed that the Officers of the PSB serve a fixed term with the PSB, for example either;

- One year
- Two Years
- Three Years

but with a process in place allowing for removal/replacement of Officers in appropriate circumstances.

G. Committee member pool

It is envisaged that the Officers (not the Lay Chairs) of each PSB also form part of a pool of potential (possibly revolving) members for relevant FRC sub committees/panels – such as Complaints/FTP, Appeals etc.

H. Remuneration

It is proposed that whether the PSB meet quarterly, bi-annually or even eventually annually, the Officers of the PSB be paid for their attendance at each PSB meeting and for any additional attendance at any FRC sub committee meetings.

In terms of the possibilities outlined later on in this Work Plan relating to the role of the PSB possibly encompassing Registration and VE, if it was decided that the PSB have the function of either Registering applicants or Validating applicants evidence (or both) then it would probably be necessary to have one or more paid members of the PSB who had specific responsibility for this role. These members would likely have a full or part time, temporary contract whilst this work was being carried out. Again, if this were a role of the PSB that was decided upon as being an ongoing role, this would need to be reflected in the need for a permanent but part time/ad hoc contract. If it were a role to be performed just during the Transitional period, any such contract would reflect a temporary, full or part time contract.

I. Frequency of Meetings

As suggested above, it is envisaged that the PSB would meet either;

- Quarterly
- Bi Annually
- Annually

and this will probably change, depending on whether it was decided that the work of registration and/or VE be a role of the PSB or the FRC and, if it became a role of the PSB, whether this was an ongoing role or just during the Transitional period.

## **Part Two**

The following are possible options for the roles of the FRC/PSBs, specifically with regard to the areas of;

- Registration

- Validation of Evidence (hereafter “VE”)

These will be followed with related proposals for the possible structure and processes of the PSBs, taking into account these different role possibilities.

**Option One - FRC and PSBs share the role of Registration and VE;**

This would mean the FRC and PSBs working together on processing all applications from applicants.

One possibility might be that the FRC would receive ALL applications and those that were Profession Specific would be passed to the respective PSB for VE, with an audit function carried out by the FRC on a percentage of the applications where VE had been done by the PSB.

Of necessity, this would only relate to those applications which were Profession Specific. With regard to Multi Disciplinary Practitioner (MDP) applications, the FRC of necessity would need to have the role of dealing with MDP’s.

The PSBs would therefore check and validate all evidence from Profession Specific applicants (including Grandparenting/APEL) relating to initial entry on to the Register and possibly relating thereafter to revalidation and CPD.

It is proposed that the FRC would have the role of receiving and processing all payments accompanying applications.

The advantage in sharing these roles, either during just the Transitional Period or ongoing, is primarily;

- A shared workload, leading to possibly speedier processing of Registrant applications (however, as above, provided there is correct planning and sufficient resources, the need to share the workload is quite possibly negated)
- A speedier process based upon a presumed closer contact with existing Profession Specific Professional Associations, which would aid the validation and Grandparenting/APEL process

The potential disadvantages are;

- Lesser financial economies of scale
- Possible public perception of a lack of independence
- No single source of contact for all enquiries relating to Registration or VE
- Possible difficulties in fragmented communication, working practices and delivery, when split between 12 or more PSBs and the FRC.
- No single point of communication for all work relating to validation of evidence
- A potentially time consuming process of differentiation of applications from MDP’s.
- Possible confusion from MDP’s as to which PSB to submit an application to

Option 1(a) – A shared role during Transitional Period only and then ongoing role solely for the FRC

It is possible that the role could be shared between the FRC and PSBs, as above, during the Transitional period only, being the more labour intensive period, however, the potential advantages and disadvantages specified immediately above would still apply.

#### Option 1(b) - Ongoing shared role

As immediately above, the possibility of an ongoing, shared role exists although the same potential advantage and disadvantages exist and will continue to be present.

#### **Option Two - FRC has the sole role for Registration and VE**

This would mean the FRC receiving and processing all applications from applicants. It would also check and validate all evidence (including Grandparenting/APEL) relating to initial entry on to the Register and relating thereafter to revalidation and CPD. It would also, of necessity, mean the FRC would have the role of receiving and processing all payments accompanying applications.

If the FRC has the sole role for Registration and VE, the main perceived advantages are;

- Public perception of Independence
- Financial Economies of Scale
- A single source of contact for all enquiries, from all sources, relating to Registration or VE
- A single point of communication for all work relating to validation of evidence, both for practitioners and Professional Associations.
- There would be no need for a potentially time consuming process of differentiation by a PSB of applications from Multi Disciplinary Practitioners (MDP's), which would be the case if Registration and/or VE was a role of the PSBs
- No confusion from MDP's as to which PSB to submit an application to.

A possible difficulty would be the amount of work required, especially during the Transitional period, to carry out initial Registrations (although, obviously, during the first say 2 years, there will be no requirement for Registrant revalidation and therefore validation of requisite evidence).

Any such potential difficulties concerning workload can be overcome and well managed with correct planning, backed up with sufficient resources (see later). For example, it is envisaged that the initial work of processing applications from applicants who are already members of Professional Associations will hopefully be aided by liaison with the Professional Associations themselves and Fast tracked. For example, to avoid duplication, the Professional Associations could provide a list of current members who meet the relevant membership requirements for that Association and define what those requirements are and this could then be cross referenced as a source of information to validate applications and evidence in support of applications.

#### **Option Three - PSBs have sole role of Registration and VE**

Here it is envisaged that each PSB would have the role of Registering and VE for each Profession specific applicant for Registration. The Responsibility would have to rest with the FRC and if this particular option were adopted, then it would be necessary to have an Audit function carried out by the FRC on, for example, samples of Registration or Revalidation applications/evidence.

If the registration and revalidation role was carried out by the PSB (as well as VE) then each PSB would also likely need to take on the role of processing registration fees.

The undertaking of the role by the PSBs could either be during the;

- a. Transitional Period only or
- b. Ongoing.

A possible advantage in sharing this role between 12 (eventually more) PSBs, either during just the Transitional Period or ongoing, is primarily;

- A split workload, leading to possibly speedier processing of Registrant applications (however, as above, provided there is correct planning and sufficient resources, the need to share the workload is quite possibly negated).
- A speedier process based upon a presumed closer contact with existing Profession Specific Professional Associations, which would aid the validation and Grandparenting/APEL process

The potential disadvantages are;

- Lesser financial economies of scale
- Possible public perception of a lack of independence
- No single source of contact for all enquiries relating to Registration or VE
- Possible difficulties in fragmented communication, working practices and delivery, when split between 12 or more PSBs and the FRC.
- Increased audit function of FRC re application forms and evidence etc
- Financial audit function – if PSBs each processed registration fees
- No single point of communication for all work relating to validation of evidence
- A potentially time consuming process of differentiation of applications from MDP's.
- Possible confusion from MDP's as to which PSB to submit an application to
- Possible difficulties in proportionate division of Registration fees from MDP's

### **Part Three**

#### **Fee Levels for Registration**

The input of the FWG members is invited as to what would be an acceptable/realistic level of fee to be set for Registration.

Possible consideration may also reflect a two level structure reflecting a possible higher cost of initial registration, followed by a lesser fee for renewals.

