Procedural Guideline
Rehabilitation Consultant Registration

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1. Overview

Procedural Guidelines outline DVA’s requirements and supporting guidance for Rehabilitation Providers (providers) and their Rehabilitation Consultants (consultants) working with DVA clients. Providers are expected to follow this guideline in registering consultants with DVA, ensuring inexperienced consultants are mentored in line with DVA’s mentoring requirements and ensuring currency of training of DVA registered consultants. Consultants are expected to follow this guideline when completing their D9255 Consultant Registration form and in maintaining their registration with DVA.

DVA works with a pool of contracted providers that have satisfied DVA’s registration requirements. DVA has a diverse client profile often presenting with complex medical and physical conditions acquired as a result of their service. To ensure the best outcome for DVA’s clients, it is essential consultants are appropriately registered with DVA and work under the conditions of their registration status.

Consultants must be registered with DVA before they can deliver rehabilitations services for DVA clients in accordance with the requirements contained in this guideline.

2. Rehabilitation Consultant registration requirements

Table 1: Rehabilitation Consultant registration requirements

<table>
<thead>
<tr>
<th>Topic</th>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registering consultants with DVA</td>
<td>• Consultants must be registered with DVA before delivering any rehabilitation services to DVA clients.</td>
</tr>
<tr>
<td></td>
<td>• Providers must complete and submit the D9255 Consultant Registration form (D9255 form) to register a consultant with DVA and submit the completed form to <a href="mailto:rehab.service.providers@dva.gov.au">rehab.service.providers@dva.gov.au</a>. The form must not be submitted to DVA directly by the consultant.</td>
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<tr>
<td></td>
<td>• Providers must undertake due diligence to ensure that the information in the D9255 form is accurate and complete. Consultant registration is subject to audit by DVA.</td>
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<tr>
<td>Mentoring</td>
<td>• Consultants who do not meet DVA’s non-mandatory criteria must be mentored until relevant experience has been gained. The criterion are:</td>
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<td>o a minimum of two years’ hands on occupational rehabilitation, working across a broad cross-section of clients in the areas of vocational and psychosocial needs (including medical management)</td>
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<td></td>
<td>o at least six months’ experience working with DVA clients or other workers from a similar environment, such as police or emergency service personnel</td>
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<tr>
<td></td>
<td>o at least six months’ experience assisting clients with complex medical conditions, and</td>
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</tbody>
</table>

UNCONTROLLED IF PRINTED Version 2.1: Last updated 25 July 2019
### Topic: Requirement

- at least six months’ experience translating specific skills and qualifications to other industries and assisting clients to move to a new employer, to change careers and/or move into a new industry (only applies to consultants whose professional scope of practice includes completing vocational assessments)

- Providers must ensure that they have a mentoring program in place to support inexperienced consultants. Mentors must closely supervise provisionally-registered consultants, including co-signing all rehabilitation assessments, plans and reports. Provider mentoring programs are subject to audit by DVA.

### Consultant training

- Providers must ensure that DVA registered consultants have completed all four mandatory training modules:
  - Rehabilitation Online
  - Rehabilitation Program
  - Understanding the Military Experience, and

- Where DVA releases new mandatory training modules, providers must ensure that DVA registered consultants complete the training within 20 business days of notification of the new mandatory training module.

### 3. Rehabilitation Consultants

Consultants are qualified health professionals (refer to section 3.2) who are trained and experienced to provide occupational rehabilitation services and develop and implement an appropriate plan of rehabilitation services for DVA clients eligible for rehabilitation assistance.

To work with DVA clients, consultants must be Comcare registered, DVA registered and must be working for or subcontracted to a DVA contracted provider. Consultants must be registered with DVA against the relevant provider/s they are working for. If a consultant is subcontracted to more than one DVA contracted provider, they must be separately registered with DVA for each provider.

### 3.1. DVA registration categories

**Table 2: Consultant registration categories**

<table>
<thead>
<tr>
<th>Registration Type</th>
<th>Description</th>
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</thead>
</table>
| **Full Registration** | Consultant has demonstrated two years’ experience in whole-of-person (psychosocial, medical-management and occupational) rehabilitation, and has at least six months’ experience:  
- working with DVA clients or other workers from a similar environment,  
- assisting clients with complex medical conditions, and  
- translating specific skills and qualifications to other industries and assisting clients to move to a new employer, to change careers and/or |
DVA is phasing out the ‘registered with conditions’ registration category. Consultants who are currently ‘registered with conditions’ will retain this status; however will be required to update their registration prior to 31 December 2019. Consultants may apply for ‘full registration’ once they have met all of the non-mandatory requirements as applicable to their profession.

### 3.2. Health professional qualifications

In line with Comcare registration requirements, consultants must have one of the following qualifications recognised, accredited or be eligible for registration by one of the following associations or Australian Health Practitioner Regulation Agency registration boards (however described):

<table>
<thead>
<tr>
<th>Profession</th>
<th>Credentialing body</th>
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<tbody>
<tr>
<td>Medical Practitioner</td>
<td>Australian Health Practitioner Regulation Agency</td>
</tr>
<tr>
<td>Nurse</td>
<td>Australian Health Practitioner Regulation Agency</td>
</tr>
<tr>
<td>Occupational Therapist</td>
<td>Australian Health Practitioner Regulation Agency</td>
</tr>
<tr>
<td>Physiotherapist</td>
<td>Australian Health Practitioner Regulation Agency</td>
</tr>
<tr>
<td>Psychologist</td>
<td>Australian Health Practitioner Regulation Agency</td>
</tr>
<tr>
<td>Exercise Physiologist</td>
<td>Exercise and Sports Science Australia</td>
</tr>
<tr>
<td>Rehabilitation Counsellor</td>
<td>Australian Society of Rehabilitation Counsellors, or Rehabilitation Counselling Association of Australia</td>
</tr>
<tr>
<td>Social Worker</td>
<td>Australian Association of Social Workers</td>
</tr>
<tr>
<td>Speech Pathologist</td>
<td>Speech Pathology Australia</td>
</tr>
</tbody>
</table>

DVA applies the Comcare process of staff management detailed in the [Criteria and Operational Standards for Workplace Rehabilitation Providers 2015](https://www.dva.gov.au/services-and-support/health-care/consultancy/registration), which is based on the Heads of Workers’ Compensation Authorities’ Nationally Consistent Approval Framework for Workplace Rehabilitation Providers. See Appendix 2 Section 4.4 of the Standards for guidance on consultant qualifications, knowledge and experience.

Providers are responsible for verifying their consultants have the required qualifications and hold current registration or are eligible for membership with the relevant professional association.
Department of Veterans’ Affairs
Rehabilitation Provider Procedural Guidelines: Rehabilitation Consultant Registration

3.2.1. Provisionally-registered health professionals:

Where a health professional is provisionally-registered with their professional association, the following applies:

- In order to practice, provisionally-registered health professionals must be receiving clinical supervision by an accredited clinical supervisor of the same profession. This clinical supervisor may be external to the DVA contracted provider.

- A provisionally-registered health professional is eligible for ‘provisional registration’ with DVA. Provisionally-registered health professionals will also require mentoring in DVA’s whole-of-person approach to rehabilitation by a senior consultant within the company until they attain ‘full registration’ with DVA:
  - Provisionally-registered professionals must nominate a mentor in their D9255 form to be eligible for approval to work with DVA clients.
  - The mentor may be of another discipline as long as that mentor has ‘full registration’ status with DVA and is working for the same DVA contracted provider.
  - The mentor and clinical supervisor may be the same person where the mentor/clinical supervisor and mentee are both registered with the same DVA contracted provider and the mentor/clinical supervisor has ‘full registration’ with DVA.

- Providers are responsible for ensuring their DVA registered consultants have clinical supervisors in place in line with professional requirements (may be internal or external).

- The ‘affiliate’ category of membership described by the Australian Society of Rehabilitation Counsellors does not meet Comcare’s minimum qualification requirement to work as a consultant. Consultants holding qualifications described at this level of membership are not eligible for approval as a DVA consultant.

3.3. DVA-Specific requirements for approval to work with DVA clients

When allocating DVA cases to consultants, providers must consider their consultants’ experience and skill level in view of the client’s condition, needs and potential case complexity in order to achieve cost-effective, timely and proactive outcomes.

Providers must also ensure that the consultant has sufficient capacity to service the client based on their needs. Given the complexity of DVA clients’ issues, providers must ensure that DVA registered consultants:

- are given an appropriate case load that allows them to be responsive to client needs, and
- maintain regular and sufficient work hours so that they can be reasonably contactable during business hours. Consultants who are employed casually (i.e. are not routinely or predictably contactable) are not suitable for DVA clients and should not be put forward for DVA registration.
3.4. Mentoring requirements

Providers are required to have a mentoring program in place that supports and closely supervises provisionally-registered consultants so they can gain the necessary experience to meet DVA’s requirements and assist DVA clients. Mentoring programs are subject to audit by DVA.

Where a consultant does not have the relevant experience outlined in Table 4, professional supervision through an employer based mentoring program must be undertaken for the length of time it requires the individual to gain the relevant experience.

Mentors must co-sign any deliverables for DVA, including assessments, plans and reports. The mentor is not required to be of the same discipline as the consultant requiring mentoring, however is required to have ‘full registration’ status with DVA. During this period of mentoring, consultants can only be considered for ‘provisional registration’ with DVA.

Once a consultant has acquired relevant experience, they must resubmit the D9255 form with updated information. Following this, the consultant can be considered for ‘full registration’ with DVA where they meet all other relevant requirements.

4. Consultant registration process

Consultants must be registered with DVA against the relevant DVA contracted provider/s before they can deliver rehabilitation services to DVA clients. Consultant registration is subject to audit by DVA.

4.1. D9255 Consultant Registration Form

In order to register with DVA, providers and consultants must complete the D9255 Consultant Registration form.

Providers are responsible for undertaking due diligence to verify the accuracy and currency of information presented in the D9255 form. All sections of the form must be completed before it is submitted to DVA.

<table>
<thead>
<tr>
<th>Table 4: D9255 form requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Form requirement</td>
</tr>
<tr>
<td>Comcare ID</td>
</tr>
<tr>
<td>Location information</td>
</tr>
</tbody>
</table>
## Form requirement

<table>
<thead>
<tr>
<th>Description</th>
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</thead>
<tbody>
<tr>
<td>region that they service (e.g. South Coast NSW, Hunter Region NSW, Adelaide and surrounds).</td>
</tr>
</tbody>
</table>

### Mentor details
Where a consultant does not have relevant experience as outlined below, they will require support through an employer based mentoring program to gain this experience. Mentors must be have ‘full registration’ with DVA and supply a Comcare ID.

### Mandatory requirements – registration will not be processed unless requirement met

#### Completion of DVA e-learning courses demonstrating a knowledge of military culture and DVA services.
Without exception, all consultants working with DVA clients must have completed the most recent versions of the following DVA e-learning courses:
- Rehabilitation Online
- Rehabilitation Program
- Understanding the Military Experience, and

These e-learning courses, and information about how to access the modules, are available on DVAtrain on the [DVA Website](https://www.dva.gov.au/). As other relevant courses become available, DVA will inform providers of details and the modules will need to be completed by registered consultants within 20 business days of advice from DVA.

### Non-mandatory requirements – consultant eligible for ‘provisional registration’ if not met

#### Minimum of two years hands’ on experience delivering vocational and psychosocial rehabilitation.
Consultants require a minimum of two years’ hands on experience delivering vocational and psychosocial rehabilitation to be considered for ‘full registration’ status with DVA. In the context of this requirement, psychosocial rehabilitation is inclusive of any relevant medical management interventions delivered to better equip clients to self-manage medical conditions, and meet related psychosocial needs.

This requirement ensures consultants are equipped to deliver rehabilitation consistent with DVA’s whole-of-person rehabilitation approach, which encompasses psychosocial (including medical management) and vocational rehabilitation.

Where a consultant does not have this, they will require support through an employer based mentoring program until they gain two years’ experience. Refer to the mentoring section for information about mentoring.
<table>
<thead>
<tr>
<th>Form requirement</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Experience in working with DVA clients or other workers from a similar environment such as police or emergency services personnel.</td>
<td>To be considered for ‘full registration’ with DVA, consultants must demonstrate experience working with military populations or other similar cohorts (see Table 1 of this document for more information on registration types). Similar backgrounds include police or emergency services. Applicants who do not have this background can only be considered for ‘provisional registration’ and will require support through an employer based mentoring program to gain this experience. They must work with a mentor until they have gained at least six months’ experience in this area. Refer to the mentoring section for information about mentoring.</td>
</tr>
<tr>
<td>Experience in assisting clients with complex medical conditions</td>
<td>To be considered for ‘full registration’ with DVA, consultants must demonstrate experience working with clients with complex medical conditions. Examples of complex medical conditions may include (but are not limited to) Post-Traumatic Stress Disorder and other major mental health conditions, brain injury, chronic pain, or clients with drug or alcohol dependence. Consultants who do not have this background can only be considered for ‘provisional registration’ and will require support through an employer based mentoring program to gain this experience. They must work with a mentor until they have gained at least six months’ experience in this area. Refer to the mentoring section for information about mentoring.</td>
</tr>
<tr>
<td>Experience in translating specific skills and qualifications to other industries and assisting clients to move to a new job with a new employer, to change careers and/or move into a new industry.</td>
<td>Only applies to those consultants whose professional scope of practice includes performing vocational assessment. This requirement relates to a consultant’s capability in interpreting the client’s existing skills and qualifications acquired during their service in a new setting outside the defence forces. This generally occurs within the context of a vocational assessment, undertaken by those disciplines whose scope of practice includes this type of assessment. The requirement entails the consultant having knowledge of a range of Defence occupations and associated skills sets, assessing the relevance of these skills sets applied in non-military environments, and working with the client to match their existing skills to appropriate roles in alternative industries while managing the client’s expectations about suitable employment. Applicants whose professional scope of practice includes completing vocational assessments and who do not have this experience can only be considered for ‘provisional registration’ and will require support through an employer based mentoring program to gain this experience. They must work with a mentor until they have gained at least six months experience in this area. Refer to the mentoring section for information about mentoring.</td>
</tr>
</tbody>
</table>
4.1.1. Submitting the D9255 form

Once complete, the Provider’s DVA Relationship Manager must submit the D9255 form to rehab.service.providers@dva.gov.au. D9255 forms must not be directly submitted to DVA by consultants.

The information provided in the D9255 form, together with supporting evidence, is subject to audit by DVA. Providers are required to verify the information before submitting the form to DVA, including:

- ensuring the consultant’s experience is substantiated through their CV
- verifying all four mandatory DVA training modules have been completed, and
- undertaking pre-employment due diligence checks.

Providers must ensure that consultants do not commence working with DVA clients until they receive written confirmation that their registration has been processed. DVA will endeavour to process consultant registrations within five business days, however, where peak workloads are experienced the timeframe may be extended to ten working days.

5. Procedure for updating consultant details

5.1. Upgrading a consultants registration status

Where a provisionally-registered consultant has gained sufficient experience to seek ‘full registration’ status, a new D9255 form needs to be submitted to DVA. The DVA Relationship Manager should email rehab.service.providers@dva.gov.au with an updated D9255 form reflecting the consultant’s experience.

As with new registrations, providers are required to verify the information on the form, undertake due diligence and ensure the consultant’s training is up to date. Due diligence should include obtaining formal confirmation from the consultants mentor that the consultant now has sufficient experience to meet DVA’s full registration requirements. This information should be retained by the provider and is subject to audit form DVA.

5.2. New employees previously registered with DVA

When a DVA registered consultant changes employers/providers, and the new employer/provider is contracted with DVA, a new D9255 form for the consultant must be submitted to DVA denoting the new DVA provider and up to date consultant details. This ensures that details such as geographic location and mentoring status remain current. Consultants registering with a new provider are required to have completed DVA’s four mandatory training modules regardless of whether these modules where required when the consultant was previously registered with DVA:

- Rehabilitation Online
- Rehabilitation Program
- Understanding the Military Experience, and
• Non-liability Health Care (2017).

Where a consultant is engaged by more than one provider (such as for a consultant working on a contracted basis), a D9255 form must be submitted for each DVA provider in which they intend to work with DVA clients via the relevant DVA Relationship Manager.

In order to accept referrals from DVA, a provider must be listed on DVA’s register of approved providers, regardless of whether the consultant has been previously approved to work with DVA clients.

5.3. Cessation of employment of existing consultants

Providers must notify DVA immediately where a DVA registered consultant ceases their employment. The DVA Relationship Manager should email rehab.service.providers@dva.gov.au and DVA will deactivate the consultant’s registration.

6. Revocation or suspension of registration

DVA’s priority is ensuring clients receive high quality rehabilitation services that are delivered by skilled and competent rehabilitation professionals. In order to ensure this, DVA reserves the right to suspend or revoke a consultant’s registration, or change a consultant’s registration status from ‘full registration’ to ‘provisional registration’ under the following circumstances:

• the consultant loses their Comcare or professional registration
• the consultant does not complete mandatory training modules
• DVA receives multiple complaints about the quality of the consultants service delivery, their professionalism or their responsiveness during business hours, and/or
• there is strong evidence that the consultant does not possess the skills to meet DVA’s non-mandatory registration criteria. This includes where a consultant gives false or misleading responses about their qualifications and/or experience on their D9255 form, and cannot support their qualifications and/or experience where supporting information requested by DVA.

DVA will work closely with the provider where there are issues regarding a consultant’s performance. This may include undertaking an investigation where complaints or issues are raised by a client or a delegate, and/or undertaking an audit of the consultants experience and qualifications.

Performance issued will first be raised in writing, and where there has not been a demonstrable improvement within 20 business days, DVA will seek to either suspend, revoke or change the consultant’s registration status. Notice will be given to the DVA relationship manager in writing.
## Appendix A: Impacts of DVA requirements on consultant registration status

### Table 1: Impacts of DVA requirements on consultant registration status

<table>
<thead>
<tr>
<th>D9255 form</th>
<th>DVA requirements</th>
<th>Implications if requirement is not met</th>
<th>Impact on registration status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Q6.</td>
<td>Completion of DVA e-learning courses demonstrating a knowledge of military culture and DVA services.</td>
<td>Consultants are ineligible for registration if this requirement is not satisfied.</td>
<td>Ineligible for registration</td>
</tr>
<tr>
<td>Q7.</td>
<td>Minimum of two years’ hands on experience in occupational rehabilitation, working with a broad cross-section of clients in the areas of vocational and psychosocial needs.</td>
<td>Where a consultant cannot demonstrate two years’ experience in hands-on occupational rehabilitation, they will require professional supervision through an employer based mentoring program until they have gained the experience. Mentors must have ‘full registration’ with DVA, and are required to co-sign rehabilitation assessments, reports and plans. The mentoring arrangements must remain in place until the consultant has acquired two years of industry experience in psychosocial rehabilitation (including relevant medical management activities) and vocational rehabilitation. A new D9255 form must be submitted to DVA when sufficient experience has been gained to apply for ‘full registration’ status.</td>
<td>Provisional registration – mentoring required until two years’ experience is gained.</td>
</tr>
<tr>
<td>Q8.</td>
<td>Experience in working with DVA clients or other workers from a similar environment such as police or emergency services personnel</td>
<td>Where a consultant cannot demonstrate at least six months’ experience working with DVA clients or other workers from a similar environment, they will require professional supervision through an employer based mentoring program. Mentors must have ‘full registration’ with DVA, and are required to co-sign rehabilitation assessments, reports and plans. The mentoring arrangements must remain in place until the consultant has acquired at least six months of experience working with DVA clients. A new D9255 form must be submitted to DVA when sufficient experience has been gained to apply for ‘full registration’ status.</td>
<td>Provisional registration – mentoring required until six months experience is gained.</td>
</tr>
<tr>
<td>D9255 form</td>
<td>DVA requirements</td>
<td>Implications if requirement is not met</td>
<td>Impact on registration status</td>
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<tr>
<td>Q9.</td>
<td>Experience in assisting clients with complex medical conditions</td>
<td>Where a consultant cannot demonstrate at least six months’ experience assisting clients with complex medical conditions, they will require professional supervision through an employer based mentoring program. Mentors must have ‘full registration’ with DVA, and are required to co-sign rehabilitation assessments, reports and plans. The mentoring arrangements must remain in place until the consultant has acquired at least six months of experience assisting clients with complex medical conditions. A new D9255 form must be submitted to DVA when sufficient experience has been gained to apply for ‘full registration’ status.</td>
<td></td>
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<tr>
<td>Q10.</td>
<td>Experience in translating specific skills and qualifications to other industries and assisting clients to move to a new job with a new employer, to change careers and/or move into a new industry.</td>
<td>This criterion is only applicable for consultants whose professional scope of practice includes completing vocational assessments. Professions whose scope of practice does not include undertaking vocational assessments (such as Occupational Therapists, Physiotherapists and Exercise Physiologists) can still gain ‘full registration’ status where they do not meet this criterion, however they must not undertake vocational assessments. A consultant whose professional scope of practice includes undertaking vocational assessments will require professional supervision through an employer based mentoring program if they cannot demonstrate at least six months’ experience:</td>
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<tr>
<td></td>
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<td>in translating specific skills and qualifications to other industries, and</td>
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<td></td>
<td></td>
<td>assisting clients to move to a new job with a new employer, to change careers and/or move into a new industry.</td>
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<tr>
<td></td>
<td></td>
<td>Mentors must have ‘full registration’ with DVA, and are required to co-sign rehabilitation assessments, reports and plans. The mentoring arrangements must remain in place until the consultant has acquired at least six months of experience in translating specific skills and qualifications to other industries.</td>
<td></td>
</tr>
<tr>
<td>D9255 form</td>
<td>DVA requirements</td>
<td>Implications if requirement is not met</td>
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<td>industries, and assisting clients to move to a new job with a new employer, to change careers and/or move into a new industry. A new D9255 form must be submitted to DVA when sufficient experience has been gained to apply for ‘full registration’ status. A consultant whose professional scope of practice does not include completing vocational assessment should not be allocated to a client on a return to work Rehabilitation Plan, unless the provider can demonstrate how this deficiency will be met (i.e. use of a suitably qualified consultant to complete vocational assessment services).</td>
<td>Full registration</td>
</tr>
</tbody>
</table>

Where a consultant answers yes to all questions (except question 10 where the consultant is not from a professional discipline whose scope of practice includes performing vocational assessment services), they will be eligible for ‘full registration’ with DVA.