

## **Feedback on the Draft Accreditation Standards AHPRA**

### **General Observation of Accreditation Standards**

The expectations of Providers in meeting the AHPRA Accreditation Standards for a national CERT IV qualification exceeds the normal general practices of conducting a course at this AQF level. The extensive additional management reporting required, the 500 hours of placement with monitoring processes in place, the requirement to virtually audit health services or facility for work placements is demanding on a provider.

Perhaps the Accreditation Committee can consider ways to decrease this extra work load and also provide consistency across all jurisdictions, for example:

- a) Have a register of approved health services or facility for work placement
- b) Develop a National Student Enrolment Assessment process that ensures students wishing to enrol are able to demonstrate their ability to complete the course. (Ensuring that students are not being set up to fail)
- c) Provide a national checklist for ensuring students are fit to practice safely at all times – this provides consistency across the board
- d) A standardised Register of Agreement template

### **In the preamble:**

#### **The Accreditation Committee acknowledges and recognises the role of:**

The Standards for Registered Training Organisations (RTOs) 20151, the Australian Skills Quality Authority (ASQA),

The Accreditation Committee does not seek to duplicate that role, but rather seeks assurance of the application of standards to the program of study (the program). These accreditation standards apply to the program and aspects of the education provider that are directly related to delivery of the program. The Accreditation Committee applies these standards to ensure education providers and their programs provide Aboriginal and Torres Strait Islander health practice students with the knowledge, skills and attributes required for competent and ethical practice of Aboriginal and Torres Strait Islander health practice in Australia.

### **OPEN COMMENT -**

The Training Package rules, developed by industry, have set the criteria for competency. The RTO Standards provide support to those rules as well as ensuring that delivery and assessment processes achieves an outcome of competency that allows the student to enter the employment market job ready. Additional criteria added that is not within the industry competency performance skills and knowledge's leads to a breach of the Principles of Assessment – "Fairness". This means that additional learning to unit requirements is acceptable but not assessable

---

### **Page 9 Implementation of formal mechanisms**

The Accreditation Committee recognises that it is likely that the VET (ASQA/TAC/VQRA) or Higher Education (TEQSA) regulator has assessed the education provider's policy and procedure portfolio. The Accreditation Committee requires evidence of the implementation of formal mechanisms at the program level i.e. the outputs/outcomes, not just a description of the process, or copies of policy and procedure documents i.e. the inputs.

**COMMENT**

This statement occurs a few times in the standards. Standards state that RTOs are not required to have policies or procedures in most areas of the standards. ***In general, compliance with these clauses would be demonstrated by the RTO cooperating with ASQA in the normal course of business by providing relevant information.***

---

**Page 14, 2.10 The education provider ensures the recruitment, appointment and promotion of Aboriginal and/or Torres Strait Islander staff to contribute to student learning in the program.**

**COMMENT**

It is recognised that many HLTAHW units specify assessment by an Aboriginal and Torres Strait Islander qualified Trainer and Assessor. However, most of this relates to the assessor not the Trainer and states;

“Assessment must therefore be undertaken by a workplace assessor who has expertise in the unit of competency or who has the current qualification being assessed and who is:

- Aboriginal or Torres Strait Islander him/herself

or:

- accompanied and advised by an Aboriginal or Torres Strait Islander person who is a recognised member of the community with experience in primary health care

Should the accreditation standards reflect these conditions

---

**Page 17 , 3.6 Unit learning outcomes in the program address all the professional capabilities endorsed by the Aboriginal and Torres Strait Islander Health Practice Board of Australia.**

**COMMENT**

If the professional capabilities of the unit topic endorsed by the Board exceeds the units performance and Knowledge evidence then this does not meet the principles of assessment, “Fairness” and is not compliant. Page 24 5.1 States; “All the professional capabilities endorsed by the Aboriginal and Torres Strait Islander Health Practice Board of Australia and unit/subject learning outcomes are mapped to assessment tasks in the program”.

It does not say if this is additional or within the performance evidence and Knowledge evidence of industry requirements

---

**Expected info for inclusion states** Three de-identified examples of student work placement and practical training assessments (lowest mark, highest mark and average mark), -

**COMMENT**

Clarification please. There is no marks/\*grading in competency based training! It is 100% or not competent.