



Response template for providing feedback to public consultation on draft proposed accreditation standards

The Podiatry Accreditation Committee welcomes your feedback on the draft proposed professional capabilities and the draft proposed accreditation standards.

Please use this response template to respond to the questions on the **draft proposed accreditation standards for podiatry and podiatric surgery programs**.

Please indicate which set of draft proposed accreditation standards you are providing feedback on by placing an 'X' in the box below. Please use a separate response template for each document you are providing feedback on.

Then provide your responses to all or some of the questions in the text boxes on the following pages. You do not need to respond to a question if you have no comment.

<input type="checkbox"/>	Draft proposed accreditation standards for entry-level podiatry programs
<input type="checkbox"/>	Draft proposed accreditation standards for podiatric therapeutics programs for registered podiatrists and podiatric surgeons
<input type="checkbox"/>	Draft proposed accreditation standards for registered podiatrists and podiatric surgeons addressing requirements for endorsement of registration in relation to scheduled medicines (ESM programs)
<input checked="" type="checkbox"/>	Draft proposed accreditation standards for podiatric surgery programs

Please submit your responses to the questions in the template by email to: accreditationstandards.review@ahpra.gov.au using the subject line 'Feedback on draft proposed accreditation standards for podiatry and podiatric surgery programs'

Feedback should be provided by Friday 12 March 2021.

Stakeholder details

Please provide your details in the following table:

Name:	Dr Burke Hugo
Organisation Name:	Podiatric Medicine & Surgery Discipline, University of Western Australia

Your responses to the consultation questions

1. Does any content need to be added to the draft proposed accreditation standards?
2. Does any content need to be amended in the draft proposed accreditation standards?
<p>I understand that 'specialist colleges' are not regulated by TEQSA, however they should be expected to <u>meet</u> the standards of an AQF9 or higher qualification, not just <u>align</u> with those standards. Identical standards must be applied to both universities and non-universities or it could be viewed that non-universities are allowed a lower threshold to meet standards. I therefore suggest changing the following:</p> <p><u>Standard 2.2 on page 14</u></p> <p>"if the education provider is a specialist college, information on how the learning outcomes <u>meet</u> the AQF specifications for a Master's degree (coursework)...."</p> <p><u>Pg 19 Staffing Profile for staff responsible for management of leadership of the program.</u></p> <p>c) Should be changed from "...or fellowship of the Australasian College of Podiatric Surgery" to "...or registered Podiatric Surgeon". This wording will allow for the development of other training programs. For example, the Australian Association of Podiatric Surgeons (AAPS) may wish to develop a training program.</p> <p>To keep the document neutral, I think the ACPS should not be named within it. The UWA program or the AAPS are not named within the standards, so by naming the ACPS it could seem they have special status with AHPRA over other program providers.</p>
3. Are there any potential unintended consequences of the current wording of the draft proposed accreditation standards?
<p>As stated above:</p> <p>To keep the document neutral, I think the ACPS should not be named within it. The UWA program or the AAPS are not named within the standards, so by naming the ACPS it could seem they have special status with AHPRA over other program providers, both present and future.</p>

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4. Are there implementation issues the Accreditation Committee should be aware of?

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5. In relation to the draft proposed accreditation standards:

a) Do the draft proposed accreditation standards, associated criteria, expected information and explanatory notes indicate clearly what is required for education providers to demonstrate their programs are producing safe and competent graduates?

AQF9+ Standards

The process by which non-universities demonstrate they meet AQF9 or higher standards is not clear. Is it the intention of the PAC for non-universities to self-determine, and then for the assessment panel to map evidence to the AQF standards?

5. In relation to the draft proposed accreditation standards:

b) Do you think education providers will have difficulty in providing evidence (expected information) to meet any of the criteria?

6. Do you have any general feedback on the draft proposed accreditation standards?