

**Greg Cope**

**Endeavour College of Natural Health**

**Attn: Accreditation Standards Review  
Australian Health Practitioner Regulation Agency**

**10<sup>th</sup> October, 2018**

Endeavour College appreciates the opportunity to provide feedback on the draft revised accreditation standards for Chinese Medicine accreditation.

**Structure of the Accreditation Standards:**

Endeavour College welcomes the proposed changes to the structure of the accreditation standards, and the shift of focus onto the five standards of

- Assuring safe practice,
- Academic governance and quality assurance of the program,
- Program design, implementation and resourcing,
- The student experience, and
- Assessment.

These changes beneficially reduce some of the duplication of TEQSA standards present within the currently approved standards, and responds to some concerns where interpretation of the TEQSA standards varied between bodies. Summarised in tables below are Endeavour's perspectives on each of the proposed criteria.



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**Standard 1: Assuring safe practice:**



<b>Criteria</b>		<b>Endeavour Feedback</b>
1.1	Safe practice is clearly identified in the learning outcomes of the program (including work integrated learning)	Appropriate and beneficial.
1.2	The education provider implements formal mechanisms to ensure students in the program are fit to practice safely at all times	<p>We currently monitor student fitness for participation within the course of study, however hold concerns about the phrasing of this standard and how it may balance with privacy and anti-discrimination obligations. This standard may compel (or may need to compel) disclosures from students where not currently required of them, compel college action based on disclosures made for the purpose of access and equity (which may be inappropriate or impermissible within that context), or introduce fitness to practice concerns where student participation in the course would be supported by reasonable adjustments based on equity or religious grounds.</p> <p>This standard may be more appropriately clarified to ensure formal mechanisms exist for responding to disclosures from students or identified concerns about fitness for practice, rather than implying potential obligations to solicit or require student disclosures where to do so may be inconsistent with other legislative requirements.</p>
1.3	Students in the program are required to achieve relevant pre-clinical capabilities, including having an appropriate level of English language skills, prior to each period of work integrated learning.	Appropriate and beneficial.



1.4	Health practitioners who supervise students in the program during work integrated learning hold current registration in Australia for the clinical elements they supervise.	<p>Appropriate and beneficial, where the supervision and assessment are a specific component of students obtaining registration within that category.</p> <p>Endeavour would seek assurance that the application of this standard would not obligate supervisors to be registered in multiple Chinese medicine categories where the specific clinical subject being supervised did not directly contribute to graduate recognition in multiple Chinese medicine categories.</p>
1.5	Internal and external facilities and health services where students in the program engage in work integrated learning maintain relevant accreditation and licences.	<p>We express significant concern about this standard, and question its appropriateness and also its equity.</p> <p>Endeavour has made contact with approved NSQHS accrediting agencies as described within the consultation documents. These agencies have advised us that they cannot accredit clinics such as those operated by complementary medicine providers under these standards, making this requirement impossible to meet. Advice from these agencies indicates that they are obligated to apply the entirety of the standards, and the focus of multiple components is incompatible and inappropriate to Chinese medicine practice environments, and they would need to seek external authority to apply a modified version of these standards. This approach is also inconsistent with other AHPRA registered professions with similar practice environments.</p> <p>Another framework or standard may be more suitable in this instance, however we would suggest that site accreditation through TEQSA and the meeting of all existing legislative requirements is both appropriate and sufficient, and this standard would more appropriately monitor this accreditation rather than introduce additional accreditation requirements.</p> <p>We would also express concern about the potential for this standard to</p>



		<p>introduce inequity between educational providers who specialise in complementary medicine (and hence have a student body primarily composed of non-statutorily registered professions) and those providers who are primarily or exclusively delivering to statutorily registered professions. A fee framework such as that used within RACGP accrediting agencies for example would be calculated based on entirety of the student body and not only those Chinese medicine students requiring facility accreditation. As Chinese medicine students are a very small minority of the overall student body, this risks impacting the financial management of courses where fees are significant per practicing student.</p>
1.6	<p>The education provider requires students to comply with the Chinese Medicine Board of Australia's guidelines relevant to safe practice, and provides mechanisms for students to familiarise themselves with any changes to relevant guidelines as they arise.</p>	<p>Appropriate and beneficial.</p>
1.7	<p>The education provider complies with its obligations under the Health Practitioner Regulation National Law and other laws, as in force in each state and territory (National Law).</p>	<p>Appropriate and beneficial.</p>
1.8	<p>The education provider requires students to comply with a code of conduct consistent with the Chinese Medicine Board of Australia's expectations of ethical and professional conduct.</p>	<p>Appropriate and beneficial.</p>



**Standard 2: Academic governance and quality assurance of the program:**

Criteria		Endeavour Feedback
2.1	The education provider is currently registered with TEQSA.	Appropriate and beneficial.
2.2	Students in the program have opportunities to input into the decision-making processes addressing program design, implementation and quality.	Standards 2.2 to 2.10 significantly duplicate TEQSA standards, without meaningful variation that would be specific to the department or qualification. Clarification of scope and purpose that is sufficient to more clearly differentiate CMBA and TEQSA roles and purpose of each assessment would be beneficial within these standards.
2.3	The education provider has robust academic governance for the program that includes systematic monitoring, review and improvement, and a committee or similar entity with the responsibility, authority and capacity to develop, implement and change the program to meet the needs of the Chinese medicine profession and health workforce needs.	
2.4	Formal mechanisms exist for quality improvement of the program, using student feedback and other evaluations, internal and external academic and professional peer review to evaluate and improve the design, implementation and quality of the program.	
2.5	There is external stakeholder input to the design, implementation and quality of the program, including from representatives of the Chinese Medicine profession, other health professions, prospective employers, health	



	consumers and graduates of the program.	
2.6	Formal mechanisms are implemented to anticipate and respond to contemporary developments in Chinese medicine and education of health practitioners within the curriculum of the program.	
2.7	There are formal mechanisms that ensure regular monitoring of the suitability of supervisors and the ongoing quality assurance of work integrated learning instruction and supervision in the program, including evaluation of student feedback.	
2.8	Staff and students work and learn in a physically and culturally safe environment.	
2.9	The education provider assesses and actively manages risks to the program, program outcomes and students enrolled in the program.	
2.10	The education provider appoints academic staff at an appropriate level to manage and lead the program.	
2.11	The education provider actively recruits or draws upon staff with the specialist knowledge, expertise and cultural capabilities to facilitate learning in Aboriginal and Torres Strait Islander health.	<p>The inclusion of this standard is appropriate and beneficial, however the practicality of implementation is of concern (given the very small national number of Chinese medicine practitioners who identify as being Aboriginal and/or Torres Strait Islander, and the other existing obligations within staff recruitment).</p> <p>Further clarification as to what specific outcomes would be considered</p>



		appropriate, and their scope within a multiple qualification/multiple site institution would be beneficial. This standard may be more achievable were it limited to 'draws upon individuals or organisations' as opposed to 'draws upon staff', or "seeks to draw upon staff" which would encourage employment applications from ATSI individuals.
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**Standard 3: Program design, implementation and resourcing:**

Criteria		Endeavour Feedback
3.1	The program is accredited by TEQSA or, for education providers with self-accrediting authority; the program has been approved by the university board or committee responsible for program approval.	Appropriate and beneficial
3.2	TEQSA or the relevant university board or committee has approved the AQF level of the program at Bachelor (AQF Level 7) or higher.	Appropriate and beneficial
3.3	Cultural competence is integrated within the design and implementation of the program and is clearly articulated in unit/subject learning outcomes, with an emphasis on Aboriginal and Torres Strait Islander cultures and cultural safety in the Australian healthcare setting.	Appropriate and beneficial
3.4	A coherent educational philosophy informs the program design and implementation.	Appropriate and beneficial
3.5	The curriculum design includes vertical and horizontal integration of theoretical concepts and practical application	Appropriate and beneficial



	throughout the program including simulation and work integrated learning experiences.	
3.6	Contemporary principles of interprofessional education and reflective practice are clearly addressed by the learning and teaching methods in the program	Appropriate and beneficial
3.7	Unit/subject learning outcomes in the program address all the professional capabilities endorsed by the Chinese Medicine Board of Australia.	Appropriate and beneficial
3.8	The education provider ensures work integrated learning experiences provide students in the program with regular opportunities to reflect on their observations of practice in the clinical setting.	Appropriate and beneficial
3.9	The education provider has an active relationship with the practitioners who provide instruction and supervision to students during work integrated learning, and formal mechanisms are in place to ensure selection, training and review of those supervisors.	Appropriate and beneficial
3.10	The program is responsive to, and considers, social determinants of health.	Appropriate and beneficial
3.11	The quality, quantity, duration and diversity of student experience during work integrated learning in the program is sufficient to produce a graduate who has demonstrated the knowledge, skills and professional attributes to practice Chinese medicine	Appropriate and beneficial





	in a competent and ethical manner.	
3.12	Legislative and regulatory requirements relevant to the Chinese medicine profession are taught and their application to practice is assessed during periods of work integrated learning in the program	Appropriate and beneficial
3.13	The education provider appoints academic staff at an appropriate level to implement the program.	Appropriate and beneficial
3.14	The program has the level and range of human resources, facilities, equipment and financial resources to sustain the quality and scope of education required for students to achieve all the professional capabilities endorsed by the Chinese Medicine Board of Australia.	Appropriate and beneficial
3.15	Staff leading and managing the program have sufficient autonomy to request the level and range of human resources, facilities, equipment and financial resources within the program.	Appropriate and beneficial

**Standard 4: The student experience:**



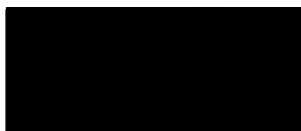
<b>Criteria</b>		<b>Endeavour Feedback</b>
4.1	Program information is complete, accurate, clear and accessible.	Appropriate and beneficial
4.2	The education provider identifies and provides learning support services to meet the academic learning needs of students in the program.	Appropriate and beneficial
4.3	There are specific strategies to address the recruitment, admission, participation and completion of the program by Aboriginal and Torres Strait Islander peoples.	Appropriate and beneficial

## Standard 5: Assessment



Criteria		Endeavour Feedback
5.1	All the professional capabilities endorsed by the Chinese Medicine Board of Australia and unit/subject learning outcomes are mapped to assessment tasks in the program.	Appropriate and beneficial
5.2	Multiple valid, reliable and informative assessment tools, modes and sampling are used throughout the program, including evaluation of student capability through direct observation of students in the clinical setting.	Appropriate and beneficial
5.3	Program management and unit/subject co-ordination ensures valid, reliable and informative assessment outcomes.	Appropriate and beneficial
5.4	Staff who assess students in the program are suitably qualified and experienced and prepared for the role.	Appropriate and beneficial
5.5	Formal mechanisms are in place to ensure the learning outcomes and assessment for all work integrated learning activities are clearly defined and known to both students and supervisors.	Appropriate and beneficial

Kind regards,



Greg Cope – Program Leader Chinese Medicine (Acting)

