

OBSERVATIONS ON DRAFT ACCREDITATION STANDARDS: CHINESE MEDICINE

NOTE

When providing feedback, members should have reference to the guidance on the consultation questions on page 5 of the consultation paper (attachment 11.7.2); that is:

1. Does any content need to be added?
2. Does any content need to be amended?
3. Are there any potential unintended consequences of the current wording?
4. Do the proposed revised accreditation standards, associated criteria, expected information and explanatory notes indicate clearly what is required for education providers to demonstrate they are producing safe and competent graduates?
5. Do you consider education providers will have difficulty in providing evidence (expected information) to meet any of the criteria?
6. Do you have any other general feedback or comments on the proposed revised standards?

The following review is based on the above questions recommended for review in the consultation brief issued by HPCA.

- Parts of the Draft Accreditation Standards for Chinese medicine are neither concise, explicit nor comprehensive, e.g.: “Expected information without an explicit reference to the criterion ... to which it relates within the explanation is insufficient and an explanation without the explanation to support it is also insufficient.” Or this on the assessment of learning outcomes: “Three de-identified examples of student work-integrated learning assessments – lowest mark, highest mark and average mark – which show students attained the professional capabilities.” Consequently, education providers would find it difficult to comply with the standards because the way the “three de-identified examples of assessments” are applied is unclear.
- The document should be written in plain English to make the standards easily understood and meaningful for training providers.
- If this is not done, training providers will have difficulty meeting the standards, especially in providing evidence that they meet all of the criteria needed to produce safe and competent graduates.
- Notable omissions and/or issues in the draft include:
 - Listing all of the principles of assessment and rules of evidence
 - Making clear ambiguous statements open to wide interpretation and/or misinterpretation
 - Spelling/grammar mistakes

- Training and assessment requirements for trainers and assessors
- Mention of professional indemnity and public liability insurance required for the training environment
- Mention of compliance with AHPRA Code of Conduct
- Ways to ensure students have the capacity to undertake studies before enrolment and do not suffer any impairment
- Mention of the need for students to operate equipment found in a TCM practice
- The need to evaluate and validate improvements in the design, implementation and quality of the program.
- The need for training staff to maintain currency of their knowledge and skill
- Poorly worded and virtually meaningless guidance on presenting explanation and expected information
- Absence of health consumer feedback as an additional gauge of student performance
- Overlooking the importance of validating the principles of assessment in determining learner competence
- Need for training providers to be open and transparent in providing information to prospective and enrolled students, e.g. appeal processes, channels for complaints and grievances, etc

In short, the revised accreditation standards, associated criteria, expected information and explanatory notes do not appear to indicate clearly what is required for education providers to demonstrate they are producing safe and competent graduates.

The document would benefit from a re-write in certain sections. For added clarity a supporting guide to the standards should be prepared to improve understanding of the standards required for acupuncture, Chinese medicine and Chinese herbal dispensing programs.

The following table contains suggested changes, which are highlighted in red:

This accreditation standards document accommodates a range of educational models and variations in curriculum design, teaching methods, and assessment approaches (page 4 of 31). The document;

- is a revised multi-profession approach to accreditation standards. Following several national reviews there has been a directive from the Council of Australian Governments (COAG) to streamline the accreditation process as there is significant duplication of tasks between the professions (which have more in common with each other than they have differences) which adds considerable cost to each of the profession.

- **will be used in conjunction with another document (Chinese Medicine Professional Capabilities)** which is currently being developed which outlines the professional capabilities for each specific profession - page 4 of 5 of the Consultation paper. Some of the comments provided may be more appropriate for the capabilities document rather than the generic document.

It should be noted that within the education sector “competency standards” are being replaced by “capabilities” which defines what a graduate/practitioners skills/attributes should be upon graduation and whether they are able to meet the challenges in the workforce.

Page No.	Point No./Paragraph	Add/Insert	Reasons/Comments	Suggested Rewordings
4	1 st line of last paragraph	Add the word “flexibility” between fairness and validity	Forms part of principles of assessment	
6	1.1 3 rd column Expected information for inclusion with accreditation application/ monitoring response 2 nd bullet point		<p>“Three de-identified examples of assessments – lowest mark, highest mark, average mark – which show that safe practice is being assessed.”</p> <p>The above statement should be reworded because it is ambiguous and therefore open to wide interpretation/misinterpretation.</p> <p>Consequently, education providers would find it difficult to comply because the meaning behind the “three de-identified examples of assessments” is unclear.</p> <p>Note: The “three de-identified examples” are repeated in 1.1, 1.2 and 1.3.</p>	Analysing Data showing the percentage of students passing subjects dealing with safe practice would validate learning outcomes
6	1.2 2 nd column Criteria	... are fit to practise...	Wrong spelling	

Page No.	Point No./Paragraph	Add/Insert	Reasons/Comments	Suggested Rewordings
	The education provider... are fit to “practice”			
6	<p>1.2</p> <p>3rd column</p> <p>Expected information for inclusion with accreditation application/ monitoring response</p> <p>2nd bullet point</p>		<p>Three de-identified examples of assessments – lowest mark, highest mark, average mark ...</p> <p>The above statement should be reworded because it is ambiguous and open to wide interpretation/ misinterpretation.</p> <p>Consequently, education providers would find it difficult to comply because the meaning behind the “three de-identified examples of assessments” is unclear.</p> <p>It is noted that the “three de-identified examples” are repeated in 1.1, 1.2 and 1.3.</p>	
	<p>1.3</p> <p>3rd column</p> <p>Expected information for inclusion with accreditation</p>		<p>Three de-identified examples of assessments – lowest mark, highest mark, average mark ...</p>	

Page No.	Point No./Paragraph	Add/Insert	Reasons/Comments	Suggested Rewording
	application/ monitoring response 2 nd bullet point		<p>The above statement should be reworded because it is ambiguous and open to wide interpretation/misinterpretation.</p> <p>Consequently, education providers would find it difficult to comply because the meaning behind the “three de-identified examples of assessments” is unclear.</p> <p>It is noted that the “three de-identified examples” are repeated in 1.1, 1.2 and 1.3.</p>	
7	1.4 2 nd column Criteria	Insertcurrent “ training & assessment qualification and AHPRA ” registration in Australia.....	Any professional supervisor should hold a Certificate IV in Training & Assessment or higher qualification	
7	1.5 3 rd column Expected Information 1 st bullet point	Add ... Maintain relevant accreditation, licences, professional indemnity and public liability insurance covering training activities.	These insurance policies are essential for safe practice in a training environment	
8	1.8		Consistent with CMBA accreditation	... comply with the CMBA Code of

Page No.	Point No./Paragraph	Add/Insert	Reasons/Comments	Suggested Rewording
	2 nd column Criteria		standards, i.e. CMBA Code of Conduct	Conduct consistent with ...
9	Student fitness to practise	Fitness to practise includes a student's capacity and/or impairment to safely undertake <i>work-integrated learning</i> . <i>Impairment</i> has a specific meaning in Australia (see Glossary).	For clarity.	
9	Work-Integrated learning Achievement of pre-clinical capabilities prior to work-integrated learning	... they can perform needling, related therapies and operate equipment safely before providing acupuncture to patients.	For clarity	
9	Work-Integrated learning supervisors 1 st sentence	<i>Work integrated learning</i> conducted in Australia must be supervised by supervisors who hold training and assessment qualifications and registration with the National Board,	Training and assessment qualifications are mandatory	
10	Relevant accreditation and licensing	Add 3 rd bullet point 3. Carry professional indemnity and public liability insurance covering the training environment.	Insurance cover mandatory for training institutions	

Page No.	Point No./Paragraph	Add/Insert	Reasons/Comments	Suggested Rewording
12	2.4 2 nd column Criteria		To ensure program improvements are evaluated and validated	<i>Formal mechanisms</i> exist for quality improvement of the <i>program</i> , using student feedback and other evaluations, internal and external academic and professional peer review to evaluate and validate improvements in the design, implementation and quality of the <i>program</i> .
12	2.4 3 rd column Expected information	Add 7 th bullet point Examples of implementation of formal mechanisms relating to validation of quality improvements to the program	Quality improvements must be validated to ensure they are effective	

Standard 2: Academic governance and quality assurance of the program

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
13	2.10 3 rd column Expected information	Add to the last bullet point - Currency of continuing professional development of staff	Staff should maintain currency of their knowledge and skill	
15	Standard 2: Explanatory notes Guidance on presenting explanation and expected information 1 st paragraph		Poorly worded – meaning unclear	Expected information without an explicit reference to the criterion (or criteria) to which it relates within the explanation is insufficient and an inadequate explanation is also insufficient.
18	3.8 3 rd column Expected information	Add another point: • Samples of health consumer feedback on student treatment performance	Health consumer feedback provides another gauge of student performance	
18	3.11		Meaning unclear	The following needs to be rewritten to

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
	3 rd column Expected information		How can 3 examples indicate that the student has attained professional capabilities in such a diverse modality?	make it explicit and meaningful for training providers “Three de-identified graded examples of completed student <i>work-integrated learning</i> assessments – lowest mark, highest mark, average mark – which show students attained the <i>professional capabilities in each learning outcome.</i> ”
18	3.12 3 rd column Expected info		Validation is a key part of the principles of assessment in determining learner competency	Clear identification of where relevant requirements are taught, assessed and validated during <i>work-integrated learning</i>
20	Standard 3: Explanatory notes Guidance on presenting explanatory and expected information		Poorly worded – meaning unclear	Expected information without an explicit reference to the criterion (or criteria) to which it relates, within the explanation is insufficient and

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
	1 st paragraph			an inadequate explanation is also insufficient.

Standard 4: The student experience

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
23	4.1 3 rd column Expected information	1 st bullet point Information provided to prospective students (prior to enrolment) and enrolled students about the program, e.g. student handbook/prospectus, product disclosure statement, etc.	Explicit information required	
23	4.1 3 rd column Expected information	Add to the 3 rd bullet point Course information handbooks and/or links to website pages containing <i>program</i> information for prospective and enrolled students, e.g. appeal processes, channels for handling complaints and grievances	Open and transparent information should be provided	
23	4.3 3 rd column Expected information	Add to the bullet point ... Aboriginal and/or Torres Strait Islander Peoples, e.g. cultural sensitivity and support programs	Explicit examples	
24	Standard 4: Explanatory notes Guidance on presenting		Poorly worded – meaning unclear	Expected information without an explicit reference to the criterion (or criteria) to

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
	explanatory and expected information			which it relates, within the explanation is insufficient and an inadequate explanation is also insufficient.

Standard 5: Assessment

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
25	5.1 Expected information 3 rd column 3 rd bullet point		Too ambiguous.	Suggested rewording: Provide de-identified samples of student work-integrated learning assessments that show how students attained professional capabilities in each learning outcome.
25	5.2 2 nd column Criteria		Principles of Assessment should be followed	Multiple fair, flexible, valid, reliable and informative assessment tools, modes and sampling are used throughout the <i>program</i> , including evaluation of student capability through direct observation of students in the clinical setting plus feedback from health consumers.
25	5.3 2 nd column Criteria		Rules of evidence should be followed	<i>Program</i> management and <i>unit/subject</i> co-ordination

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
				ensures the rules of evidence – validity, sufficiency, authenticity, currency – lead to reliable and informative assessment outcomes.
	5.3 3 rd column Expected information	1 st bullet point		Examples of implementation of <i>formal mechanisms</i> for program management and <i>unit/subject</i> coordination ensure reliable and informative assessment outcomes based on the principles of assessment and rules of evidence in determining learner competence.
	5.3 3 rd column Expected information	Add 5 th bullet point Assessment tools and process to be validated by external assessors.	Ensures reliability, i.e. assessment is consistently interpreted and assessment results are comparable	

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
			irrespective of the assessor	
27	Standard 5: Explanatory notes Guidance on presenting explanatory and expected information		Poorly worded – meaning unclear	Expected information without an explicit reference to the criterion (or criteria) to which it relates, within the explanation, is inadequate and therefore insufficient.
27	Staffing profile for staff responsible for assessment of students in the program	Delete “for staff responsible”	Rewording for brevity	Staffing profile for assessment of students in the program
27	Staff profile ... in the program	- Replace “to” with “the” - Delete “to” between the words “program” and “have”.	Wrong word	The <i>Accreditation Committee</i> does not assess against the <i>Higher Education Standards Framework 2015</i> , but it expects the education provider to submit clear evidence that all staff with responsibilities for assessment of students in the program have: ...

Page No.	Standard Criteria	Add/Insert	Reasons	Suggested Wording
27	Staff profile in the program	Add point:	Training qualification requirement	