

# Consultation Paper

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8 December 2020

## Draft proposed professional capabilities and accreditation standards for podiatry and podiatric surgery

In 2019 the Podiatry Board of Australia requested that the Podiatry Accreditation Committee (the Committee) review and update the professional capabilities and accreditation standards for podiatry and podiatric surgery to ensure the documents reflect contemporary practice. This includes reviewing and updating:

- Threshold professional capabilities for:
  - Podiatrists
  - Podiatric surgeons
- Accreditation standards for:
  - Entry-level podiatry programs
  - Podiatric therapeutics programs for registered podiatrists and podiatric surgeons
  - Registered podiatrists addressing requirements for endorsement of registration in relation to scheduled medicines (ESM programs)
  - Podiatric surgery programs

### Approach to consultation

From mid-July to mid-September 2020, the Committee undertook a confidential phase of preliminary consultation with key stakeholders including universities, professional associations and jurisdictions (the Commonwealth and state/territory health agencies). Preliminary consultation enabled the Committee to test proposals in the initial draft of the draft proposed professional capabilities and draft proposed accreditation standards and refine them before proceeding to public consultation. It also gave stakeholders an opportunity to provide feedback to improve the clarity of the documents.

The Accreditation Committee has refined the documents to reflect stakeholders' feedback and is now releasing this consultation paper, the draft proposed professional capabilities and the draft proposed accreditation standards for feedback from any interested stakeholders and individuals.

### Providing feedback

The Accreditation Committee welcomes your feedback on the draft proposed professional capabilities and the draft proposed accreditation standards. The documents can be downloaded from <https://www.podiatryboard.gov.au/Accreditation/Accreditation-consultations.aspx>.

Please use the response templates to respond to the questions. There are separate response templates for the draft proposed professional capabilities and for the draft proposed accreditation standards. **Please use a separate response template for each document you are providing feedback on.** Please indicate in the table at the top of the response template which document you are commenting on.

### Questions

1. Does any content need to be added to the draft proposed professional capabilities or the draft proposed accreditation standards?

2. Does any content need to be amended in the draft proposed professional capabilities or the draft proposed accreditation standards?
3. Are there any potential unintended consequences of the current wording of the draft proposed professional capabilities or the draft proposed accreditation standards?
4. Are there implementation issues the Accreditation Committee should be aware of?
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?
  - 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 professional capabilities or the draft proposed accreditation standards?

Please submit your responses to the questions in the template by email to: [accreditationstandards.review@ahpra.gov.au](mailto:accreditationstandards.review@ahpra.gov.au). Feedback should be provided **by Friday 12 March 2021**.

## Publication of submissions

The Accreditation Committee and Ahpra publish submissions at their discretion.

We generally publish submissions on our websites to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published.

We will not place on our websites, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally-identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them, and their publication does not imply any acceptance of, or agreement with, these views by the Accreditation Committee or Ahpra.

The Accreditation Committee and Ahpra accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.

Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is requested.

**Please use the template to send your responses to the Accreditation Committee's questions by email to:**

**[accreditationstandards.review@ahpra.gov.au](mailto:accreditationstandards.review@ahpra.gov.au)**

**The closing date for feedback is Friday 12 March 2021**

**For further information about the project, please contact**

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# Explanatory material to accompany consultation papers

## Overview

The Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), established the Podiatry Board of Australia (the Board) to begin national regulation of the profession from 1 July 2010.

Podiatrists and specialist podiatric surgeons in Australia are regulated by the National Law and must be registered with the Board. Only individuals who hold current registration with the Board are permitted to use the professional title of podiatrist or podiatric surgeon in Australia. Registered podiatrists and podiatric surgeons must comply with the Board's standards, codes and guidelines, including engaging in professional development and practice to continuously maintain clinical competence and professional practice.

In 2019 the Podiatry Board of Australia requested that the Podiatry Accreditation Committee review and update the professional capabilities and accreditation standards for podiatry and podiatric surgery to ensure the documents reflect contemporary practice. The review commenced in late 2019 and will be completed in early 2021.

The Accreditation Committee is now undertaking public consultation on the draft proposed professional capabilities and accreditation standards for podiatry and podiatric surgery, including:

- Draft proposed threshold professional capabilities for:
  - Podiatrists (Attachment A1)
  - Podiatric surgeons (Attachment A2)
- Draft proposed accreditation standards for:
  - Entry-level podiatry programs (Attachment B1)
  - Podiatric therapeutics programs for registered podiatrists and podiatric surgeons (Attachment B2)
  - Registered podiatrists and podiatric surgeons addressing requirements for endorsement of registration in relation to scheduled medicines (ESM programs) (Attachment B3)
  - Podiatric surgery programs (Attachment B4)
  - Summary of draft proposed accreditation standards (Attachment B5)

Professional capabilities identify the knowledge, skills and professional attributes needed to safely and competently practise as a podiatrist or podiatric surgeon in Australia. They describe the threshold or minimum level of professional capability required.

Accreditation standards are used to assess whether a program of study, and the education provider that provides that program of study, provide persons who complete the program with the professional capabilities needed to safely and competently practise in Australia.

Accreditation standards require education providers to design and implement a program where the curriculum maps to the professional capabilities specified in the standards. Accreditation of a program assures the Board and the community that students graduating from the accredited podiatric program have the knowledge, skills and professional attributes needed to safely and competently practise as a podiatrist or podiatric surgeon in Australia.

The Accreditation Committee accredits programs of study that meet the accreditation standards and monitors approved programs and education providers to ensure they meet and continue to meet the accreditation standards. Graduates of an accredited and approved podiatry or podiatric surgery program are qualified for general registration to practise as an entry-level podiatrist or qualified for specialist registration as a podiatric surgeon. The Board considers approving an accredited program as providing a qualification for registration purposes, based on its accreditation by the Accreditation Committee. The Board does not directly examine or assess the capability of applicants for registration who have completed their podiatric education in Australia and hold an approved qualification.

## Approach to the draft proposed professional capabilities and accreditation standards

The Committee's approach to the draft proposed professional capabilities and accreditation standards has been based on a comprehensive review of professional capabilities and accreditation standards nationally and internationally, including a cross-profession analysis of professional capabilities, accreditation standards and processes for all health professions within the National Scheme. This public consultation phase gives stakeholders an opportunity to provide feedback to the Accreditation Committee on the draft proposed professional capabilities and the draft proposed accreditation standards.

The draft proposed professional capabilities and accreditation standards emphasise safe practice, cultural competence, and outcomes relevant to the expected competence of graduates. The draft proposed professional capabilities are structured around five domains, that are supported by key capabilities and enabling components. The five domains are:

- Domain 1: Podiatrist (or podiatric surgeon)
- Domain 2: Professional and ethical practitioner
- Domain 3: Communicator and collaborator
- Domain 4: Lifelong learner
- Domain 5: Quality and risk manager

The draft proposed accreditation standards are structured around five standards, supported by criteria that set out expectations for an education provider and its program to meet the accreditation standard and expected information that education providers will be asked to submit for each accreditation standard as part of their accreditation application or monitoring response. The five standards are:

- Standard 1: Assuring safe practice
- Standard 2: Academic governance and quality assurance of the program
- Standard 3: Program design, implementation and resourcing
- Standard 4: The student experience
- Standard 5: Assessment

## The relationship between the Board's requirements for endorsement for scheduled medicines and accreditation decisions

Endorsement of registration identifies practitioners with additional qualifications and specific expertise. A podiatrist or podiatric surgeon whose registration is endorsed for scheduled medicines under section 94 of the National Law is qualified to administer, obtain, possess, prescribe, sell, supply or use Schedule 2, 3, 4 or 8 medicines for the treatment of podiatric conditions, as listed in the *National podiatry scheduled medicines list*<sup>1</sup> and in accordance with the relevant legislation and regulations in each state or territory in which they are practising.

In 2018, following approval from the COAG Health Council, the Podiatry Board of Australia introduced a revised registration standard and guidelines for the endorsement for scheduled medicines (ESM registration standard). The ESM registration standard describes the Board's minimum requirements for a podiatrist or podiatric surgeon to have their registration endorsed for scheduled medicines.<sup>2</sup>

The registration standard outlines two pathways for endorsement:

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<sup>1</sup> The National podiatry scheduled medicines list is attached to the *Registration standard: Endorsement for scheduled medicines* available from <https://www.podiatryboard.gov.au/Registration-Standards.aspx>. Accessed on 9 April 2020.

<sup>2</sup> Podiatry Board of Australia, *Registration Standard: Endorsement for Scheduled Medicines*, 2018 available from <https://www.podiatryboard.gov.au/Registration-Endorsement/Endorsement-Scheduled-Medicines.aspx>. Accessed on 9 April 2020. Podiatry Board of Australia, *Guidelines: Endorsement for Scheduled Medicines*, 2018 available from <http://www.podiatryboard.gov.au/documents/default.aspx?record=WD18%2f25232&dbid=AP&chksum=XIIIMaKMTApOi%2bgrAIRPUJw%3d%3d>. Accessed 27 October 2020.

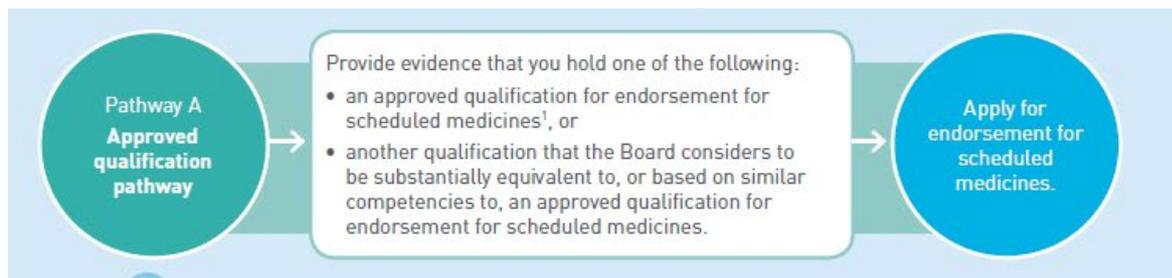
- Pathway A: Approved Qualification Pathway **or**
- Pathway B: Supervised Practice Pathway under the Board's *Registration Standards: Endorsement for scheduled medicines*<sup>3</sup>.

### Pathway A: Approved qualification pathway

Under Pathway A, a podiatrist or podiatric surgeon is qualified for endorsement after completing a qualification that is approved by the Board for the endorsement for scheduled medicines (or another qualification that the Board deems to be substantially equivalent to, or based on similar competencies to, an approved qualification in endorsement for scheduled medicines).

Pathway A is shown in Figure 1 below.

Figure 1: Pathway A to endorsement for scheduled medicines



### Pathway B: Supervised practice pathway

Under Pathway B, a podiatrist or podiatric surgeon is eligible for endorsement for scheduled medicines after completing an approved qualification in podiatric therapeutics (or another qualification that the Board deems to be substantially equivalent to, or based on similar competencies to, an approved qualification in podiatric therapeutics) **and** undertaking additional requirements as outlined in the Board's *Guidelines: Endorsement for Scheduled Medicines* and *Registration Standard: Endorsement for Scheduled Medicines*<sup>4</sup>.

The additional requirements in the Board's *Guidelines: Endorsement for Scheduled Medicines* are:

- successful completion of approved online case studies,
- a period of supervised practice, and
- development of a portfolio of evidence for assessment by the Board.

Pathway B is shown in Figure 2 below.

<sup>3</sup> Podiatry Board of Australia *Registration Standard: Endorsement for Scheduled Medicines*, 2018 available from <https://www.podiatryboard.gov.au/Registration-Endorsement/Endorsement-Scheduled-Medicines.aspx>. Accessed on 9 April 2020.

<sup>4</sup> Podiatry Board of Australia, 2018. *Guidelines: Endorsement for Scheduled Medicines* and *Registration Standard: Endorsement for Scheduled Medicines* available from <https://www.podiatryboard.gov.au/Registration-Endorsement/Endorsement-Scheduled-Medicines.aspx>, accessed on 12 October 2020.

Figure 2: Pathway B to endorsement for scheduled medicines<sup>5</sup>



## Accreditation decisions

When the Accreditation Committee reports on its accreditation decision to the Board under section 48 of the National Law, it will identify if, in addition to addressing professional capabilities for general registration as a podiatrist or specialist registration as a podiatric surgeon, the accredited program:

- included education in podiatric therapeutics that covers the theoretical foundation for endorsement to ensure graduates can safely and competently commence their supervised practice for Pathway B of the ESM registration standard
- included education and training in podiatric therapeutics and clinically-supervised practice to ensure that graduates have the professional capabilities required to administer, obtain, possess, prescribe, sell, supply or use Schedule 2, 3, 4 or 8 medicines for the treatment of podiatric conditions, as listed in the *National podiatry scheduled medicines list*.

## Options for education providers

Podiatrists and podiatric surgeons who meet the Board's requirements for endorsement of their registration in relation to scheduled medicine currently do so via Pathway B because there are not yet any approved qualifications for Pathway A.

The proposed accreditation standards are designed to provide an option for education providers to seek accreditation of programs they want the Board to approve as providing qualifications for Pathway A. The Board may approve a program as providing a qualification suitable for Pathway A if the Accreditation Committee advises the Board that the curriculum includes education and training in podiatric therapeutics and clinically-supervised practice to ensure that graduates have the professional capabilities required to administer, obtain, possess, prescribe, sell, supply or use Schedule 2, 3, 4 or 8 medicines for the treatment of podiatric conditions, as listed in the *National podiatry scheduled medicines list*.

Education providers also have the option to seek accreditation of programs they want the Board to approve as providing qualifications for Pathway B. The Board may approve a program as providing a qualification in podiatric therapeutics suitable for Pathway B if the Accreditation Committee advises the Board that the curriculum includes learning and assessment of the theoretical foundation for endorsement to ensure graduates can safely and competently commence their supervised practice.

Education providers may also seek accreditation of programs they want the Board to approve as providing qualifications for general registration as a podiatrist or specialist registration as a podiatric surgeon. The Board may approve a program as providing a qualification suitable for general registration as a podiatrist or for specialist registration as a podiatric surgeon if the Accreditation Committee advises the Board that the curriculum includes learning and assessment of the relevant professional capabilities.

<sup>5</sup> More information, including two videos about Pathway B to endorsement for scheduled medicines, is available from the Podiatry Board of Australia's website at <https://www.podiatryboard.gov.au/Registration-Endorsement/Endorsement-Scheduled-Medicines.aspx>. Accessed 26 October 2020.

## Attachments

Attachment A1: Draft proposed professional capabilities for entry-level podiatrists

Attachment A2: Draft proposed professional capabilities for podiatric surgeons

Attachment B1: Draft proposed accreditation standards for entry-level podiatry programs

Attachment B2: Draft proposed accreditation standards for podiatric therapeutics programs for registered podiatrists and podiatric surgeons

Attachment B3: Draft proposed accreditation standards for programs for registered podiatrists and podiatric surgeons addressing requirements for endorsement of registration in relation to scheduled medicines (ESM programs)

Attachment B4: Draft proposed accreditation standards for podiatric surgery programs

Attachment B5: Summary of draft proposed accreditation standards

Attachment C1: Response template for draft proposed professional capabilities

Attachment C2: Response template for draft proposed accreditation standards