

6 September 2013

Program Manager  
Accreditation, Australian Health Practitioner Regulation Agency  
GPO Box 9958  
MELBOURNE VIC 3001

Dear Sir/Madam

### **Consultation on the Draft Accreditation Standards and Accreditation Process for Chinese Medicine Practice**

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to comment on the Chinese Medicine Accreditation Committee's (the Committee) draft *Accreditation Standards* (the Accreditation Standards) and *Accreditation Process* (the Accreditation Process) for *Chinese Medicine Practice*.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF has a strong interest in ensuring that medical providers are trained to the highest standards. Our comments on the Accreditation Standards and Process are based on research we have undertaken through our dedicated projects on health workforce issues and health practitioner regulation.

With regard to Chinese medicine practitioners, due to sometimes variable application of traditional and herbal remedies by practitioners, it is important that any entity providing training in this field meet high and consistent standards of education. Consumers who utilize Chinese traditional medicine, whether of their own choice or in consultation with other medical practitioners, should be able to access providers who have been trained to a high standard through accredited educational providers.

We feel that while the drafts meet high standards for an accrediting body, the Accreditation Standards and Process could be further strengthened with measures that incorporate a consumer-centric approach. Moreover, the Accreditation Standards do not do enough to ensure that education providers are sensitive to students of Aboriginal and Torres Strait Islander descent and other culturally and linguistically diverse groups. CHF is also concerned that the Accreditation Process lacks sufficient external input.

Our comments and recommendations on specific aspects of the Accreditation Standards and Accreditation Process are provided below.

## Accreditation Standards

### *Field 1: Governance, management and resourcing standards*

CHF believes that education providers are more accountable for their curricula when they have developed a mission statement in consultation with community providers and consumers. As such, CHF recommends that any education provider's "principal purpose," per *Standard 1.1.1*, be evaluated against whether it has consulted with community and consumer partners in developing a mission statement. Such a mission statement could also support the goals of *Standard 3.1.5* and *Standard 3.1.6* under the education provider's program design.

CHF encourages consumer and community provider engagement throughout the development and oversight of an education provider's strategic plans and curricula. Therefore, CHF recommends that consumers and community providers be explicitly listed as "external members" in the education provider's governing body, per *Standard 1.3.1*, and utilised as consultative partners in the education provider's strategic planning, per *Standard 1.3.2*, and student assessment, per *Standard 1.4.5*. CHF also recommends that the Accreditation Standards reflect that student and teaching assessments by the education providers should incorporate regular, valid and reliable feedback from both internal and external stakeholders.

### *Field 3: Program attributes*

CHF believes that the development of a robust curriculum through consultation with consumers, community practitioners, and non-government entities results in a quality education for students, and thus better outcomes for consumers once those students begin their practice. Although the Accreditation Standards contain clauses for the provision of education in clinical settings, particularly in Field 2, its programs would be strengthened by specifically identifying community partners as a resource for students in the program design. Moreover, students' education and practical experience would be significantly strengthened if consumers and practitioners are engaged for students' assessment, per *Standard 3.5*.

CHF is gravely concerned that neither *Standard 3.3* nor *Standard 3.4*, concerning admission standards and teaching quality, make any provisions for culturally and linguistically diverse groups or Aboriginal and Torres Strait Islanders. Education providers throughout Australia ensure that there is provision for these groups, and the Accreditation Standards here should reflect that common value.

### *Field 5: Professional capabilities of Chinese medicine program graduates*

CHF recommends that education providers regularly receive feedback from consumers and community practitioners regarding the quality of their graduates' practice. Such feedback is vital to making adjustments or improvements to the education provider's curriculum and program standards to better prepare its students for medical practice.

## Accreditation Process

CHF has no comment on the actual processes laid out, but is concerned that the standards of review for an education provider fall short of a truly robust framework. Most of our concerns fall under the **Processes for the assessment prior to initial accreditation of Chinese medicine programs**.

CHF feels that the process lacks sufficient details about the kind of evidence an education provider must provide to the Accreditation Unit in support of its programs, either in its application or during site visits, nor the kind of evidence it must provide if it chooses to dispute claims in the Accreditation Unit's initial report. These details should be made obvious so that consumers can have confidence in the quality of documentation used to evaluate an education provider.

Finally, CHF encourages any Accreditation Team reviewing the application of an education provider to consist of at least one sufficiently qualified consumer or practitioner who is located in the education provider's community.

CHF appreciates the opportunity to provide a submission to the Committee on the Accreditation Standards and Process. If you would like to discuss the issues raised in this submission in more detail, please contact [REDACTED] Policy Officer, at 02 6273 5444 or [REDACTED]

Yours sincerely



**Carol Bennett**  
**CHIEF EXECUTIVE OFFICER**