Public consultation

15 July 2019

Draft revised professional capabilities for Chinese medicine practitioners

We welcome your feedback on the enclosed Draft proposed professional capabilities for Chinese medicine practitioners by email to accreditationstandards.review@ahpra.gov.au by close of business on 9 September 2019.

Introduction

Professional capabilities for Chinese medicine (2013 professional capabilities) were first published in December 2013 as Field 6 of the Accreditation standards: Chinese medicine (2013 accreditation standards). The Chinese Medicine Accreditation Committee (the Accreditation Committee) is reviewing the 2013 professional capabilities as part of their review of the 2013 accreditation standards document. The resultant Draft revised professional capabilities for Chinese medicine practitioners (draft revised professional capabilities) will form part of the revised accreditation standards (2019 accreditation standards).

As with the 2013 professional capabilities, the draft revised professional capabilities will apply to education providers and their programs of study (programs) to assure those programs provide graduates with the knowledge, skills and professional attributes needed to safely and competently practise Chinese medicine in Australia.

Preliminary consultation

From mid-March until mid-May 2019 the Accreditation Committee undertook a targeted preliminary consultation to key stakeholders. Preliminary consultation enabled the Accreditation Committee to test proposals and refine them before proceeding to public consultation. It also provided an opportunity for feedback to improve the clarity of the consultation documents.

A range of stakeholders submitted written responses, including professional associations, jurisdictions (Commonwealth and state/territory health departments) and individuals.

The Accreditation Committee is now releasing its draft revised professional capabilities for public feedback.

Providing feedback

The Accreditation Committee is seeking to consult on their draft revised professional capabilities (attached). In addition to general feedback, they are interested in stakeholders’ feedback on specific questions about the revised professional capabilities.

Feedback can be provided by sending a written submission by email to accreditationstandards.review@ahpra.gov.au.
This should be provided by close of business on 9 September 2019.

Submissions for website publication should be sent in Word format or equivalent.¹

**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 National Boards.

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.

¹ We aim to publish documents in accessible formats (such as word files) to meet international website accessibility guidelines. Therefore, while you are welcome to supply a PDF file of your feedback, we ask that you also provide a text or word file. More information about this is available at www.ahpra.gov.au/About-AHPRA/Accessibility.aspx
Overview

The Health Practitioner Regulation National Law Act, as in force in each state and territory (the National Law), established the Chinese Medicine Board of Australia (the Board) to begin national regulation of the profession from 1 July 2012. The Board is responsible for the regulation of Chinese medicine practitioners and established the Accreditation Committee under the National Law in July 2012.

The 2013 professional capabilities were first published in December 2013 as Field 6 of the 2013 accreditation standards. The Accreditation Committee is reviewing the 2013 professional capabilities as part of their review of the 2013 accreditation standards document. The draft revised professional capabilities will form part of the 2019 accreditation standards.

The draft revised professional capabilities will apply to education providers and their programs to assure those programs provide graduates with the knowledge, skills and professional attributes needed to safely and competently practise Chinese medicine in Australia.

The Accreditation Committee is consulting on the content of the draft proposed professional capabilities, through both preliminary and then public consultation. Relevant feedback from preliminary consultation has been included in the draft revised professional capabilities document being consulted on at public consultation. Following analysis of feedback from public consultation, the Accreditation Committee may further modify the document prior to submitting it to the Board.

The final draft proposed professional capabilities will be submitted to the Board to approve as part of the revised accreditation standards.

Purpose and intended use of the proposed professional capabilities

Within the framework of the National Law, accreditation standards are used to assess if education providers and their programs provide graduates with the knowledge, skills and attributes for practice in Australia. The draft revised professional capabilities identify the knowledge, skills and professional attributes needed to safely and competently practise as an acupuncturist, and/or a Chinese herbal medicine practitioner and/or a Chinese herbal dispenser in Australia.

Education providers will use the professional capabilities for the development of Chinese medicine program curricula (learning and assessment).

Approach to developing the proposed professional capabilities

The approach to the draft revised professional capabilities is informed by:

- a review of recently published professional capabilities for other health professions within and outside of the National Scheme,
- a comprehensive review of the 2013 professional capabilities, and
- examination of the broader health context, higher education sector development and increasing public expectations of evidence-based health care.

Key features of the draft proposed professional capabilities

1. Many of the draft revised professional capabilities reflect the 2013 professional capabilities and are structured similarly. Domain 1 has three sub-domains specific to each division of the register (Acupuncturist, Chinese herbal medicine practitioner, and Chinese herbal dispenser) and four common domains (Domains 2-5) for Chinese medicine practitioners registered in any division of the register. The domains have been reordered so that the sub-domains specific to each division are ordered first, followed by the common domains.

2. The standard titles of the 2013 professional capabilities are replaced with domain titles based on practitioner roles. For example, the title ‘Professional and ethical conduct’ (Standard 6.1) has changed to ‘Professional and ethical practitioner’ (Domain 2). Additionally, the capabilities within the ‘Chinese medicine practice’ standard (Standard 6.5) of the 2013 professional capabilities have
been incorporated into other domains, rather than in a standalone domain. (See The proposed structure of the professional capabilities section below for further information).

3. The draft revised professional capabilities more accurately describe the level of capability needed for safe and competent practice. They are informed by capability principles to recognise that practitioners must be capable of taking appropriate and effective action to formulate and solve problems in both familiar and unfamiliar settings, as well as in complex and changing settings, rather than just showing that they know how to perform practice-related tasks in isolation.

Some of the 2013 professional capabilities only require demonstration of knowledge or understanding. For example, ‘demonstrate knowledge of the biomedical sciences enabling the practice of Chinese medicine within an inter-professional Australian healthcare context’ (Standard 6.5.5). In contrast, the draft revised professional capabilities require application of knowledge and performance of practice-related tasks in the practice setting, rather than just demonstrating knowledge and/or understanding.

4. The draft revised professional capabilities for acupuncturists and Chinese herbal medicine practitioners more accurately reflect the patient/client journey – from initial consultation and treatment that requires the practitioner to plan and perform an assessment and treatment – to subsequent consultations requiring the practitioner to assess patient/client progress and to review continuation of their treatment.

The draft revised professional capabilities are also more patient/client-centred and include engagement with, and involvement of, the patient/client at all stages of the practitioner-patient/client interaction.

5. The draft revised professional capabilities better address cultural competence and cultural safety in practice. Cultural competence and cultural safety, particularly in relation to Aboriginal and Torres Strait Islander Peoples has been incorporated into the professional capabilities. This is important because Chinese medicine practitioners in Australia require a working knowledge of factors that contribute to and influence the health and wellbeing of Aboriginal and Torres Strait Islander Peoples. These factors include history, spirituality and relationship to land, and other determinants of health in Aboriginal and Torres Strait Islander communities.

Cultural competence is a commonly used term that encompasses patient/client-centred concepts focused on demonstrating cultural safety and cultural respect. It involves interacting effectively with and responding to each client. Culturally responsive practice requires Chinese medicine practitioners to reflect not only on their own culture, but that of their patient/client and to engage in new and ongoing learning relevant to cultural safety.

The importance of cultural competence and cultural safety has been highlighted in the introduction to the professional capabilities, and an enabling component – Domain 2 – Professional and ethical practitioner – is the application of the principles of cultural competence and cultural safety to practice. The National Scheme’s Aboriginal and Torres Strait Islander Health Strategy Group’s current definition for cultural safety has been included in the professional capabilities. This definition is currently under review and any changes will be reflected in the draft revised professional capabilities document.

6. Over the last several decades, there has been increasing public expectation of employing an evidence-based health care approach for clinical decision making including assisting patients to make their informed choice of care. The term evidence-based health care recognises the advances in techniques to establish clinical efficacy. While this is a common challenge for all health professions to gather the evidence, it is both a challenge and opportunity for Chinese medicine which has evolved from experience-based practice.

Chinese medicine practitioners need the knowledge and skills to provide evidence-based medicine. This is being addressed through raising awareness of students and registered Chinese medicine practitioners to the public expectation of evidence-based health care, promoting evidence-based Chinese medicine research, and timely evidence evaluation and translation into clinical practice.
The proposed structure of the professional capabilities

The draft revised professional capabilities are organised into three sub-domains which are specific to each of the three divisions of the register (Domains 1A-1C) and four domains common to all Chinese medicine practitioners in all divisions of the register (Domains 2-5). Each domain consists of key capabilities and corresponding enabling components.

Domains

The domains comprise key capabilities that are thematically arranged and describe the essential characteristics of a competent registered Chinese medicine practitioner in Australia.

Domain 1A: Acupuncturist
Domain 1B: Chinese herbal medicine practitioner
Domain 1C: Chinese herbal dispenser
Domain 2: Professional and ethical practitioner
Domain 3: Communicator and collaborator
Domain 4: Lifelong learner
Domain 5: Quality and risk manager

Key capabilities

The key capabilities describe the key features of safe and competent Chinese medicine practice in a range of contexts and situations of varied complexity and uncertainty. During any one consultation involving a patient/client interaction or treatment, practitioners are expected to demonstrate key capabilities from various domains. This recognises that competent professional practice requires an ability to draw on and integrate the breadth of capabilities to support overall performance.

Enabling components

The enabling components describe the essential and measurable characteristics of the corresponding key capabilities and facilitate assessment of performance in the practice setting. Safe and competent Chinese medicine practitioners will demonstrate all enabling components for all key capabilities for safe and competent practice. This includes applying, adapting and synthesising new knowledge from experience to continually improve clinical and professional performance.

Next steps

After public consultation closes, the Accreditation Committee will review and consider all feedback from this consultation before making decisions about the final version of the revised professional capabilities.

Following analysis of feedback from the public consultation on the draft revised professional capabilities, the Accreditation Committee may adjust the draft revised professional capabilities prior to submitting them to the Board.
Consultation questions

When providing comments, please use the word template to address the following public consultation questions:

1. Does any content need to be added to the draft revised professional capabilities?
2. Does any content need to be amended or removed from the draft revised professional capabilities?
3. Is the language clear and appropriate? Are there any potential unintended consequences of the current wording?
4. Are there jurisdiction-specific impacts for practitioners, or governments or other stakeholders that the Accreditation Committee should be aware of, if these revised professional capabilities are adopted?
5. Are there implementation issues the Accreditation Committee should be aware of?
6. Do you have any other feedback or comments on the draft revised professional capabilities?

Feedback can be provided by email to AHPRA at accreditationstandards.review@ahpra.gov.au

The closing date for feedback is 9 September 2019

For further information regarding the project, contact the Senior Accreditation Policy Advisor, Simon Spence

simon.spence@ahpra.gov.au

Attachments

Attachment A: Draft revised professional capabilities for Chinese medicine practitioners
Attachment B: word template for providing feedback