

Statement of assessment

July 2013

Chinese medicine Accreditation Committee's statement of assessment against AHPRA's Procedures for development of accreditation standards and COAG principles for best practice regulation

The Australian Health Practitioner Regulation Agency (AHPRA) has Procedures for the Development of Accreditation Standards which are available at: <http://www.ahpra.gov.au/Legislation-and-Publications/AHPRA-Publications.aspx>

These procedures have been developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice.

Below is the Accreditation Committee's assessment of their proposal for a draft accreditation standard against the four elements outlined in the AHPRA procedures.

1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law, in particular a), c) and f) of the objectives and a) of the guiding principles.

Accreditation Committee assessment

The Accreditation Committee considers that the draft accreditation standard meets the objectives and guiding principles of the National Law, in particular a), c) and f) of the objectives and a) of the guiding principles.

The draft accreditation standard, if approved, will provide for the protection of the public by ensuring that only graduates with the knowledge, skills and attributes necessary to practise in a competent and ethical manner qualify for registration in the profession. The draft accreditation standard will facilitate the provision of high quality education and training of health practitioners, by requiring education providers to demonstrate that it has established appropriate mechanisms to ensure good governance, sufficient resourcing, appropriate teaching, learning and assessment methods, including clinical education.

The draft accreditation standard enables innovation in education of health practitioners by requiring evidence of outcomes of the program, rather than demonstration of compliance with prescribed inputs.

The draft accreditation standard will facilitate access to services, by removing prescribed requirements about curriculum content, particularly as it relates to clinical education, and by recognising the importance of simulated learning environments in health practitioner education. These aspects of the standards will reduce unnecessary restrictions on student numbers and in doing so assist workforce supply.

The draft accreditation standard also supports the National Scheme to operate in a transparent, accountable, efficient, effective and fair way by recognising existing regulation and quality assurance systems in higher education in Australia and by clearly describing the criteria that must be demonstrated to meet the accreditation standard.

2. The consultation requirements of the National Law are met

Accreditation Committee assessment

The National Law requires wide-ranging consultation on the content of draft accreditation standards.

The Accreditation Committee is consulting with the education sector, the Chinese medicine profession and governments about the content of the draft accreditation standards.

The Accreditation Committee is providing an opportunity for public comment about the content of the draft accreditation standards by undertaking a six week public consultation process. This process includes the publication of the consultation paper (and attachments) on its website.

The Accreditation Committee has drawn this paper to the attention of key stakeholders.

The Accreditation Committee will take into account the feedback it receives when finalising the draft accreditation standards for submission to the National Board for approval.

3. The draft accreditation standard takes into account relevant international standards and statements relating to education and training in the profession, and the accreditation standards applied in countries with comparable education and practice standards for the profession.

Accreditation Committee assessment

The Accreditation Committee has taken into account relevant international standards and statements relating to Chinese medicine education, including those published by the World Health Organisation, as well as accreditation standards in Hong Kong, the United Kingdom and Canada.

4. The draft accreditation standard takes into account the COAG Principles for Best Practice Regulation

Accreditation Committee assessment

In developing the draft accreditation standard for consultation, the Accreditation Committee has taken into account the Council of Australian Governments (COAG) Principles for Best Practice Regulation.

As an overall statement, the Accreditation Committee has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for education providers, the profession or the community.

The Accreditation Committee makes the following assessment specific to each of the COAG principles identified in the AHPRA procedures.

[a\) Whether the proposal results in an unnecessary restriction of competition among providers and potential providers of education programs.](#)

Accreditation Committee assessment

The Accreditation Committee considered whether the draft accreditation standard could result in an unnecessary restriction of competition among providers and potential providers of education programs. Establishing a draft accreditation standard with a focus on demonstration of outcomes will not restrict competition among providers and potential providers because all higher education providers that offer, or wish to offer, a Chinese medicine program have an opportunity to apply for assessment against the same accreditation standards.

[b\) Whether the proposal results in an unnecessary restriction of consumer choice](#)

Accreditation Committee assessment

The Accreditation Committee considers consumer choice will not be affected by the draft accreditation standard. The draft accreditation standard supports consumer choice, by allowing any higher education provider offering a Chinese medicine program to demonstrate they meet the accreditation standards.

c) Whether the overall costs of the proposal to members of the public, education providers and/or governments are reasonable in relation to the benefits to be achieved

Accreditation Committee assessment

The Accreditation Committee considered that the overall costs of the draft accreditation standard to members of the public, education providers and governments and concluded that the likely costs are appropriate when offset against the benefits that the draft accreditation standard contributes to the National Scheme, in particular to the protection of the public and facilitating the provision of high quality education and training of health practitioners.

d) Whether the accreditation authority has procedures in place to ensure that the proposed standard remains relevant and effective over time

Accreditation Committee assessment

If approved, the Accreditation Committee will review the draft accreditation standard at least every three years, including an assessment against the objectives and guiding principles in the proposed National Law and the COAG principles for best practice regulation.

However, the Accreditation Committee may choose to review the standard earlier:

- if it is necessary to ensure the standard's continued relevance and workability, or
- if the National Board asks the Accreditation Committee to review the accreditation standard.