



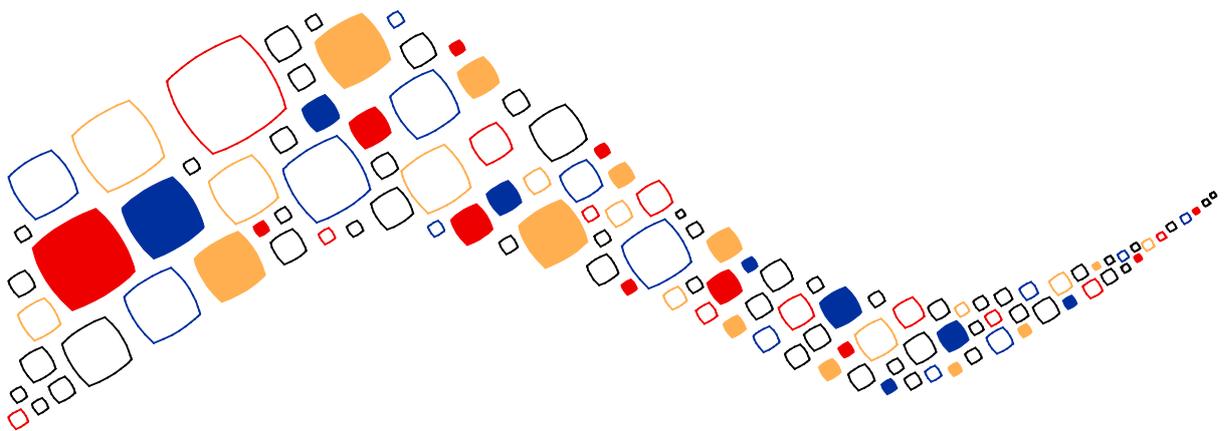
Community Services & Health  
Industry Skills Council

# Complementary & Alternative Health

## Alignment of Qualifications to the Australian Qualifications Framework

**Discussion Paper: October 2013**

*Public Consultation Version 2 - Please provide comments by Friday 14 February 2014*



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## Background

All Complementary & Alternative Health (CAH) qualifications in the Health Training Package (HLT07) are currently under review. Proposed revised qualifications will be submitted for endorsement by December 2014.

As part of the review, all content is being updated and improved, both to better meet industry needs and to comply with the new national *Standards for Training Packages*. An Industry Reference Group (IRG) comprising representatives from all CAH modalities oversees this work, and there is also a smaller Subject Matter Expert Group (SMEG) for each modality. There are two public consultation periods (at Draft 1 and Draft 2 stages) where all stakeholders are encouraged to provide feedback.

Currently, the review project is at the 'pre Draft 2' stage, with the next public consultation period scheduled for March 2014.

## Context for this Discussion Paper

Over the past few months, as SMEGs have met to discuss different qualifications, there have been many varied discussions about the alignment of CAH qualifications to the Australian Qualifications Framework (AQF). It is an important part of the critical review process to revisit, and hopefully, to reconfirm qualification levels. This is important for industry and for learners undertaking qualifications.

While there have been varied discussions around alignment or re-alignment of qualifications, of most significance are those discussions around the place of many Advanced Diploma qualifications, and whether those qualifications should be aligned at the Bachelor degree level. Comments of this nature have come from a range of sources, with many originating from valid and necessary discussion about the need to strengthen and clarify content to achieve professional outcomes.

The Community Services & Health Industry Skills Council (CS&HISC) would like to put the issue of qualification alignment on the table to allow for transparent discussion and decision-making.

The purpose of this brief paper therefore, is four fold:

- to outline requirements for Training Package qualifications in relation to AQF alignment
- to snapshot the current situation and the types of issues raised through recent discussions
- to provide information to support appropriate alignment of qualifications
- to ask the Complementary & Alternative Health community for its feedback on qualification alignment

While these issues have most potential impact on Advanced Diploma qualifications, much of the information here is also relevant for all CAH qualifications.

## Feedback

The paper was initially distributed to members of all the Subject Matter Expert Groups and the CAH Industry Reference Group. It is now being distributed to all CS&HISC stakeholders for comment. CS&HISC welcomes your comments and feedback by **Friday 14 February**. **Please email your response to [tpadmin@cshisc.com.au](mailto:tpadmin@cshisc.com.au)**

## Requirements for Training Package Qualifications

All Training Package content must meet the National Skills Standards Council (NSSC) *Standards for Training Packages*. It is these standards that guide the work of CS&HISC. In the national policy context, there is an increased focus on ensuring that qualifications are aligned at the correct level. Standard 8 reads as follows:

*Qualifications comply with the Australian Qualifications Framework specification for that qualification type*

Below is an excerpt from additional advice provided by the NSSC:

*In order to meet Standard 8 of the Standards for Training Packages, ISCs need to demonstrate compliance against the AQF specifications for qualification types. The primary evidence for ISCs to demonstrate compliance against the AQF is **documented justification** as to how the proposed qualification structure meets the AQF specifications for that qualification type.*

Prior to endorsement, qualifications will be subject to an external QA process to ensure compliance.

## Current Situation and Discussions

CAH qualifications in the Health Training Package currently exist at three levels - Certificate IV, Diploma and Advanced Diploma. Below is a brief update on the current 'pre-draft 2' situation

| Certificate IV   | Diploma  | Advanced Diploma   |
|--|--|--|
| <ul style="list-style-type: none"> <li>• Aromatherapy (SMEG is proposing removal due to lack of professional outcome)</li> <li>• Ayurvedic Lifestyle Consultation (different views in SMEG around scope/ need – under consideration)</li> <li>• Kinesiology (SMEG discussing possible removal)</li> <li>• Massage</li> </ul> | <ul style="list-style-type: none"> <li>• Aromatherapy</li> <li>• Kinesiology</li> <li>• Remedial Massage</li> <li>• Reflexology</li> <li>• Shiatsu and Oriental Therapies</li> <li>• TCM Remedial Massage</li> </ul> | <ul style="list-style-type: none"> <li>• Aromatic Medicine (SMEG discussion around the need for full qualification, limited practitioner outcomes)</li> <li>• Ayurveda</li> <li>• Homoeopathy</li> <li>• Naturopathy</li> <li>• Nutritional Medicine</li> <li>• Western Herbal Medicine</li> </ul> |

This paper has been developed based on a range of discussion and comments, including:

- the need for substantial additional and more clearly articulated anatomy, physiology, pathophysiology and pharmacology content – especially in the Advanced Diploma qualifications (with some impact on Certificate IV and Diploma qualifications also)
- questions around what the actual difference is between Advanced Diploma and Bachelor Degree
- the amount of learning required to achieve the qualification outcomes (e.g. views that Advanced Diploma outcomes not able to be achieved in less than 3 years for some modalities)
- tacit acknowledgment and / or open discussion that a degree level qualification either is, should be, or will be in the near future, the qualification required to practice

**Please note that to date there have been no comments of this type made during discussion of the Ayurveda qualifications. However, as the nature of the content across the Advanced Diploma qualifications is similar, the broader issue of AQF alignment will need to be raised for discussion in that context.**

CS&HISC is aware that some RTOs in the CAH area are moving away from the delivery of VET qualifications towards delivery of Degree programs. However, this issue is not a driver for CS&HISC, as our primary focus must be on what skills and knowledge are required for the job role.

## The Basis for Decision-Making

The first step for CS&HISC in developing or reviewing any qualification is to confirm the requirements of the job role – that is, what does the professional practitioner need to know and be able to do to work effectively and safely. Given the context of work, the issue of client safety is paramount. The next step is to determine the appropriate qualification level based on an analysis and mapping of the skill and knowledge requirements against the AQF descriptors. While there are several other factors and implications associated with any changed AQF alignment, the two steps described above are the full extent of the CS&HISC role.

Table 1 overleaf provides details of AQF descriptors for Advanced Diploma and Bachelor Degree plus a brief mapping of work roles as expressed during industry discussion. Some of the key indicators that change within the various levels of the AQF relate to:

- Critical thinking requirements
- Scope, depth and type of knowledge
- Level of autonomy in the workplace

Our initial work suggests that there **may** be a sound rationale for possible re-alignment of some qualifications. However, we welcome your expert input.

For interest, Table 2 is provided showing the AQF descriptors for Certificate IV, Diploma, Advanced Diploma and Bachelor Degree, as this is relevant to all CAH modalities.

Full details of the Australian Qualifications Framework can be found on the following link:

<http://www.aqf.edu.au/>

**TABLE 1: MAPPING OF ADVANCED DIPLOMA AND BACHELOR DEGREE AGAINST CAH PRACTITIONER ROLES**

|           | Advanced Diploma   | Bachelor Degree   | Features of Degree not in Advanced Diploma   | CAH Practitioners<br>(Homoeopaths, Naturopaths, Nutritional Medicine Practitioners, Herbalists)   |
|-----------|--|---|--|---|
| Purpose   | The Advanced Diploma qualifies individuals who apply specialised knowledge in a range of contexts to undertake advanced skilled or paraprofessional work and as a pathway for further learning | The Bachelor Degree qualifies individuals who apply a broad and coherent body of knowledge in a range of contexts to undertake professional work and as a pathway for further learning                        | A broad and <b>coherent body of knowledge</b><br><br>Undertake <b>professional</b> work  | Use a coherent body of knowledge around the following: <ul style="list-style-type: none"> <li>• anatomy &amp; physiology</li> <li>• pathophysiology</li> <li>• pharmacology</li> <li>• chemistry and bio-chemistry</li> <li>• materia medica of substantial depth and scope</li> </ul><br>Work as independent professional practitioners                        |
| Knowledge | Graduates of an Advanced Diploma will have specialised and integrated technical and theoretical knowledge with depth within one or more fields of work and learning                            | Graduates of a Bachelor Degree will have a broad and coherent body of knowledge, with depth in the underlying principles and concepts in one or more disciplines as a basis for independent lifelong learning | A broad and coherent body of knowledge with <b>depth in underlying principles and concepts</b> as basis for <b>independent lifelong learning</b> | Use a coherent body of knowledge around the following: <ul style="list-style-type: none"> <li>• anatomy &amp; physiology</li> <li>• pathophysiology</li> <li>• pharmacology</li> <li>• chemistry and bio-chemistry</li> <li>• materia medica of substantial depth and scope</li> </ul><br>Engage in self-directed ongoing learning and professional development |

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|               | Advanced Diploma  | Bachelor Degree   | Features of Degree not in Advanced Diploma  | CAH Practitioners<br>(Homoeopaths, Naturopaths, Nutritional Medicine Practitioners, Herbalists)   |
|---------------|---|---|---|---|
| <b>Skills</b> | <p>Graduates of an Advanced Diploma will have:</p> <ul style="list-style-type: none"> <li>• cognitive and communication skills to identify, analyse, synthesise and act on information from a range of sources</li> <li>• cognitive and communication skills to transfer knowledge and skills to others and to demonstrate understanding of specialised knowledge with depth in some areas</li> <li>• cognitive and communication skills to formulate responses to complex problems</li> <li>• wide-ranging specialised technical, creative or conceptual skills to express ideas and perspectives</li> </ul> | <p>Graduates of a Bachelor Degree will have:</p> <ul style="list-style-type: none"> <li>• cognitive skills to review critically, analyse, consolidate and synthesise knowledge</li> <li>• cognitive and technical skills to demonstrate a broad understanding of knowledge with depth in some areas</li> <li>• cognitive and creative skills to exercise critical thinking and judgement in identifying and solving problems with intellectual independence</li> <li>• communication skills to present a clear, coherent and independent exposition of knowledge and ideas</li> </ul> | <p>Ability to <b>review critically, consolidate</b> information and knowledge</p> <p>Exercise <b>critical thinking and judgment in problem solving with intellectual independence</b></p> <p>Communication skills to present <b>clear, coherent and independent exposition of knowledge and ideas</b></p> | <p>Critically analyse information from detailed case history, medical reports, in depth client interview in the context of the body of knowledge described above</p> <p>Bring together client information with body of knowledge to diagnose conditions within relevant natural medicine framework</p> <p>Make independent judgments about appropriate natural medicine treatments, selecting strategies from an extensive range of options (herbal treatments, homoeopathic remedies, nutritional supplementation etc)</p> <p>Communicate complex information about conditions and treatments to clients</p> |

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|                                     | Advanced Diploma  | Bachelor Degree   | Features of Degree not in Advanced Diploma   | CAH Practitioners<br>(Homoeopaths, Naturopaths, Nutritional Medicine Practitioners, Herbalists)   |
|-------------------------------------|---|---|--|---|
| Application of knowledge and skills | <p>Graduates of an Advanced Diploma will demonstrate the application of knowledge and skills:</p> <ul style="list-style-type: none"> <li>• with depth in areas of specialisation, in contexts subject to change</li> <li>• with initiative and judgment in planning, design, technical or management functions with some direction</li> <li>• to adapt a range of fundamental principles and complex techniques to known and unknown situations</li> <li>• across a broad range of technical or management functions with accountability for personal outputs and personal and team outcomes within broad parameters</li> </ul> | <p>Graduates of a Bachelor Degree will demonstrate the application of knowledge and skills:</p> <ul style="list-style-type: none"> <li>• with initiative and judgement in planning, problem solving and decision making in professional practice and/or scholarship</li> <li>• to adapt knowledge and skills in diverse contexts</li> <li>• with responsibility and accountability for own learning and professional practice and in collaboration with others within broad parameters</li> </ul> | <p>Decision making in <b>professional practice</b></p> <p><b>Accountability for own learning and professional practice</b></p>                                       | <p>Work in independent professional practice</p> <p>Engage in self-directed ongoing learning and professional development</p>   |
| Volume of Learning                  | <p>The volume of learning of an Advanced Diploma is typically 1.5 – 2 years</p>   | <p>The volume of learning of a Bachelor Degree is typically 3 – 4 years</p>   | <p>Volume of learning for degree typically starts at <b>3 years</b> (<i>roughly equivalent to 3600 hours based on 1200 hours as 1 year full time equivalent</i>)</p> | <p>Varied stakeholder input suggesting that 1.5 – 2 years represents an insufficient volume of learning.</p> <p>Difficult for CS&amp;HISC to make judgment in this area, as TP is traditionally silent on volume of learning.</p> |

**TABLE 2: COMPARISON OF QUALIFICATION CHARACTERISTICS AT DIFFERENT LEVELS OF THE AUSTRALIAN QUALIFICATIONS FRAMEWORK**

|           | Certificate IV   | Diploma  | Advanced Diploma  | Bachelor Degree   |
|-----------|--|--|---|---|
| Purpose   | The Certificate IV qualifies individuals who apply a broad range of specialised knowledge and skills in varied contexts to undertake skilled work and as a pathway for further learning  | The Diploma qualifies individuals who apply integrated technical and theoretical concepts in a broad range of contexts to undertake advanced skilled or paraprofessional work and as a pathway for further learning  | The Advanced Diploma qualifies individuals who apply specialised knowledge in a range of contexts to undertake advanced skilled or paraprofessional work and as a pathway for further learning  | The Bachelor Degree qualifies individuals who apply a broad and coherent body of knowledge in a range of contexts to undertake professional work and as a pathway for further learning  |
| Knowledge | Graduates of a Certificate IV will have broad factual, technical and theoretical knowledge in a specialised field of work and learning   | Graduates of a Diploma will have technical and theoretical knowledge and concepts, with depth in some areas within a field of work and learning  | Graduates of an Advanced Diploma will have specialised and integrated technical and theoretical knowledge with depth within one or more fields of work and learning   | Graduates of a Bachelor Degree will have a broad and coherent body of knowledge, with depth in the underlying principles and concepts in one or more disciplines as a basis for independent lifelong learning   |
| Skills    | <p>Graduates of a Certificate IV will have:</p> <ul style="list-style-type: none"> <li>• cognitive skills to identify, analyse, compare and act on information from a range of sources</li> <li>• cognitive, technical and communication skills to apply and communicate technical solutions of a non-routine or contingency nature to a defined range of predictable and unpredictable problems</li> <li>• specialist technical skills to complete routine and non-routine tasks and functions</li> <li>• communication skills to guide activities and provide technical advice in the area of work and learning</li> </ul> | <p>Graduates of a Diploma will have:</p> <ul style="list-style-type: none"> <li>• cognitive and communication skills to identify, analyse, synthesise and act on information from a range of sources</li> <li>• cognitive, technical and communication skills to analyse, plan, design and evaluate approaches to unpredictable problems and/or management requirements</li> <li>• specialist technical and creative skills to express ideas and perspectives</li> <li>• communication skills to transfer knowledge and specialised skills to others and demonstrate understanding of knowledge</li> </ul> | <p>Graduates of an Advanced Diploma will have:</p> <ul style="list-style-type: none"> <li>• cognitive and communication skills to identify, analyse, synthesise and act on information from a range of sources</li> <li>• cognitive and communication skills to transfer knowledge and skills to others and to demonstrate understanding of specialised knowledge with depth in some areas</li> <li>• cognitive and communication skills to formulate responses to complex problems</li> <li>• wide-ranging specialised technical, creative or conceptual skills to express ideas and perspectives</li> </ul> | <p>Graduates of a Bachelor Degree will have:</p> <ul style="list-style-type: none"> <li>• cognitive skills to review critically, analyse, consolidate and synthesise knowledge</li> <li>• cognitive and technical skills to demonstrate a broad understanding of knowledge with depth in some areas</li> <li>• cognitive and creative skills to exercise critical thinking and judgement in identifying and solving problems with intellectual independence</li> <li>• communication skills to present a clear, coherent and independent exposition of knowledge and ideas</li> </ul> |

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|  | Certificate IV  | Diploma   | Advanced Diploma  | Bachelor Degree   |
|--|---|---|---|---|
| <b>Application of knowledge and skills</b> | <p>Graduates of a Certificate IV will demonstrate the application of knowledge and skills:</p> <ul style="list-style-type: none"> <li>• to specialised tasks or functions in known or changing contexts</li> <li>• with responsibility for own functions and outputs, and may have limited responsibility for organisation of others</li> <li>• with limited responsibility for the quantity and quality of the output of others in a team within limited parameters</li> </ul> | <p>Graduates of a Diploma will demonstrate the application of knowledge and skills:</p> <ul style="list-style-type: none"> <li>• with depth in some areas of specialisation, in known or changing contexts</li> <li>• to transfer and apply theoretical concepts and/or technical and/or creative skills in a range of situations</li> <li>• with personal responsibility and autonomy in performing complex technical operations with responsibility for own outputs in relation to broad parameters for quantity and quality</li> <li>• with initiative and judgement to organise the work of self and others and plan, coordinate and evaluate the work of teams within broad but generally well-defined parameters</li> </ul> | <p>Graduates of an Advanced Diploma will demonstrate the application of knowledge and skills:</p> <ul style="list-style-type: none"> <li>• with depth in areas of specialisation, in contexts subject to change</li> <li>• with initiative and judgment in planning, design, technical or management functions with some direction</li> <li>• to adapt a range of fundamental principles and complex techniques to known and unknown situations</li> <li>• across a broad range of technical or management functions with accountability for personal outputs and personal and team outcomes within broad parameters</li> </ul> | <p>Graduates of a Bachelor Degree will demonstrate the application of knowledge and skills:</p> <ul style="list-style-type: none"> <li>• with initiative and judgement in planning, problem solving and decision making in professional practice and/or scholarship</li> <li>• to adapt knowledge and skills in diverse contexts</li> <li>• with responsibility and accountability for own learning and professional practice and in collaboration with others within broad parameters</li> </ul> |

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|                           | <b>Certificate IV</b>   | <b>Diploma</b>   | <b>Advanced Diploma</b>  | <b>Bachelor Degree</b>   |
|---------------------------|---|--|--|--|
| <b>Volume of Learning</b> | The volume of learning of a Certificate IV is typically 0.5 – 2 years. There may be variations between short duration specialist qualifications that build on knowledge and skills already acquired and longer duration qualifications that are designed as entry level requirements for work | The volume of learning of a Diploma is typically 1 – 2 years | The volume of learning of an Advanced Diploma is typically 1.5 – 2 years | The volume of learning of a Bachelor Degree is typically 3 – 4 years |

## Conclusion and Key Questions

Potential re-alignment of qualifications to a level that removes them from the Training Package is obviously quite a significant change for the CAH sector, and decisions need to be made in a careful and informed manner. From a CS&HISC perspective, the combination of strengthened endorsement requirements around correct AQF alignment and open stakeholder discussion of the issue, means that we must engage with stakeholders to work towards a resolution that is based on a sound rationale.

Your response to the following questions would be much appreciated:

1. What are your general views on the mapping presented in Table 1, which suggests CAH Advanced Diploma qualifications could be aligned to Bachelor Degree level?
2. If you believe that qualifications in Aromatic Medicine, Homoeopathy, Naturopathy, Nutritional Medicine and Western Herbal Medicine should become Bachelor Degree qualifications, what is your rationale **based on the AQF descriptors**? Please specify which modality your feedback relates to.
3. If you believe that qualifications in Aromatic Medicine, Homoeopathy, Naturopathy, Nutritional Medicine and Western Herbal Medicine should remain as Advanced Diploma qualifications, what is your rationale **based on the AQF descriptors**? Please specify which modality your feedback relates to.
4. If your expertise lies in the area of Ayurveda, what are your views about how Table 1 relates to work as an Ayurvedic practitioner? Please indicate if Advanced Diploma or Bachelor Degree is the most appropriate qualification, and provide your rationale **based on the AQF descriptors**.

As a final note, should there ultimately be a decision made to remove some Advanced Diploma qualifications from the Training Package, existing Advanced Diplomas would remain in place until December 2015 with the appropriate teach-out period after that.

We look forward to your feedback.