

## December 2013 Update: Alignment of Complementary & Alternative Health Qualifications to the Australian Qualifications Framework

### Background

All Complementary & Alternative Health (CAH) qualifications in the Health Training Package (HLT07) are currently under review. As part of the review, 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) where all stakeholders are encouraged to provide feedback. Currently, the review project is at 'pre Draft 2' stage, with the next public consultation period scheduled for March 2014.

As SMEGs have met to discuss different qualifications, there have been varied discussions about the alignment of CAH qualifications to the Australian Qualifications Framework (AQF). It is part of the critical review process to revisit, and hopefully, to reconfirm qualification levels. This is important for industry and for learners undertaking qualifications. The most significant discussions have been those around the place of many Advanced Diploma qualifications, and whether those qualifications should be aligned at the Bachelor degree level to fully reflect the skills and extensive knowledge needed to practice.

Qualifications potentially affected by this discussion are Advanced Diploma of Naturopathy, Advanced Diploma of Western Herbal Medicine, Advanced Diploma of Nutritional Medicine, Advanced Diploma of Homoeopathy and Advanced Diploma of Ayurveda.

*Note that CS&HISC is of the view that there has been insufficient discussion or feedback in relation to the Ayurveda work outcome, and we will be seeking further input from this sector.*

The Community Services & Health Industry Skills Council (CS&HISC) distributed a discussion paper in September 2013 to put the issue of qualification alignment on the table, and to allow for transparent discussion and decision-making. The paper was initially distributed to all Industry Reference Group and Subject Matter Expert Group members, and then to all CS&HISC stakeholders, including Registered Training Organisations (RTOs) with the qualifications on scope.

Twenty-five submissions were received, ranging from comprehensive, evidence based reports to short emails expressing particular views. There were submissions from:

- 8 Industry Bodies - Australian Naturopathic Practitioners Association (ANPA), Australian Register of Naturopaths and Herbalists (ARONAH), Complementary Medicine Association (CMA), National Herbalists Association of Australia (NHAA), Australian Traditional Medicine Society (ATMS) Australian Natural Therapies Association (ANTA), Australian Homoeopathic Association (AHA), Australian Register of Homoeopaths (AROH)
- 6 Registered Training Organisations (RTOs)
- 7 Individual Practitioners / Teachers
- 4 Representatives from other Modalities with general comments

### CS&HISC Roles and Responsibilities

CS&HISC would like to clearly communicate its roles, responsibilities and limitations in relation to qualifications in the Health Training Package. As part of the review process, CS&HISC is required to:

- develop qualifications that reflect vocational outcomes to meet industry requirements
- adhere to the standards for Training Packages, as set down by the National Skills Standards Council, which includes meeting Australian Qualification Framework requirements and providing evidence to support qualification alignment when qualifications are submitted for endorsement

The focus of Training Package qualifications is on the skills and knowledge required for vocational practice. It is this that primarily guides CS&HISC work. CS&HISC has invested significant resources into the review of all CAH qualifications since mid 2012. It has no vested interest in the retention or removal of the CAH Advanced Diploma qualifications from the Health Training Package. CS&HISC **will be guided by industry** within the confines of National Skills Standards Council requirements. Should a decision be made to retain some or all of the Advanced Diploma qualifications, then those qualifications and the units they contain will **need to reflect an AQF6 outcome**. This, of course, means that the additional and strengthened content industry has been requesting to reflect professional outcomes, is not likely to be incorporated

### Limitations of CS&HISC Role

The CS&HISC role is important but limited, and there are many important issues arising from a potential re-alignment of qualifications that are beyond the scope of CS&HISC to either manage or control. It is industry's role to manage these issues. These include:

- the need to upgrade those degree programs that are being offered
- lack of teachers with the required skill levels to teach at degree level
- only a small number of private training organisations, offering degree programs
- concern that there will be no benchmark in the national vocational and education training system and that there is no national benchmark in Higher Education
- time and cost burden on RTOs to transition programs to Bachelor degree level
- negative business impact on smaller RTOs
- potential increased cost of training for participants, with negative impact on participation
- access & equity considerations with potential participants lacking confidence to undertake degrees

### Feedback to Date

The main focus of the CS&HISC feedback analysis has been on information that directly relates to the scope of its role, i.e. how the vocational outcome aligns to the Australian Qualifications Framework, and what skills and knowledge a person truly needs to be able to work. A key ethical question arises. If a learner is doing work at a Bachelor level, should they be entitled to receive a Bachelor qualification?

The evidence provided in feedback on the Discussion Paper - *Complementary & Alternative Health: Alignment of Qualifications to the Australian Qualifications Framework* indicates that:

- the work of CAH practitioners in question does align to the Bachelor degree level as per the AQF descriptors (7 industry bodies, 3 RTOs and 5 individual submissions indicated this, regardless of whether they supported the transition to bachelor degree or not)
- existing Advanced Diploma training delivery is already, at least in part, aligned to Bachelor degree level – both in terms of content and the volume of learning – as this is needed to meet professional outcomes
- there is majority support for transition to Bachelor degree qualifications, with removal of the Advanced Diploma qualifications from the Health Training Package
- the majority of those in favour of transition are also aware of the importance of the need for adequate time to achieve this (4 – 5 years)
- there are strong reservations, especially among RTOs, around the potential impacts of change
- particular sectors are concerned about a potential lack of access to training

### Current CS&HISC Position

Based on feedback and evidence provided, the position of CS&HISC as at December 2013 is as follows:

- work on the review of the CAH Advanced Diploma qualifications will be put on hold
- CS&HISC will investigate the potential for the existing Advanced Diploma qualifications to remain in place beyond December 2015 to facilitate a period of transition to bachelor level qualifications
- CS&HISC invites further feedback on the issue from additional stakeholders by **Friday 14 February 2014**. CS&HISC requests that feedback focus on evidence showing **either how practitioner work aligns better to an Advanced Diploma than a Bachelor degree, or the other way round**. For those wishing to provide feedback, a copy of the Discussion Paper is available on the Complementary & Alternative Health pages of the CS&HISC website. For queries, please contact [tpadmin@cshisc.com.au](mailto:tpadmin@cshisc.com.au)