



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

23 April 2013

Higher Education Standards Panel Executive
GPO Box 1672
Melbourne VIC 3001

Via email: info@HEstandards.gov.au

Dear Higher Education Standards Panel

[Call for Comment \(Number 1, March 2013\): Draft Standards for Course Design and Learning Outcomes](#)

Thank you for the opportunity to comment on the *Draft Standards for Course Design and Learning Outcomes*.

The Australian Health Practitioner Regulation Agency (AHPRA) is the organisation responsible for the implementation of the National Registration and Accreditation Scheme (the Scheme) across Australia. AHPRA's operations are governed by the Health Practitioner Regulation National Law Act as in force in each State and Territory (the National Law). Each of the fourteen health professions that are part of the Scheme is regulated by a National Board. The primary role of each of the fourteen National Boards is to protect the public and they set standards that all registered health practitioners must meet.

One objective of the Scheme is "to facilitate the provision of high quality education and training of health practitioners." The National Law contains a range of provisions about the accreditation of programs of study (courses) for the health professions covered by the Scheme. These provisions include the:

- Development of accreditation standards by accreditation authorities
- Approval of accreditation standards by National Boards
- Directions about accreditation standards by the Australian Health Workforce Ministerial Council in certain circumstances
- Assessment of programs of study (courses) and education providers by accreditation authorities
- Accreditation of programs of study (courses) by accreditation authorities
- Approval of accredited programs of study for the purposes of registration by National Boards

AHPRA has recently established an Accreditation Unit to provide high quality support to accreditation within the Scheme. The interaction of the HES with accreditation of programs of study (courses) under the Scheme is of particular significance to the National Boards and AHPRA in fulfilling their statutory roles.

The comments in this submission are framed around the questions posed in the Call for Comments.

Please contact Chris Robertson, Director National Board Services, on 03 8708 9037 if you require any clarification or further information about the attached submission.

Yours sincerely

[Martin Fletcher](#)
Chief Executive Officer

Encl: AHPRA response to HES panel – Call for comment (Number 1, March 2013)

Response to HES Panel - Call for Comment (Number 1, March 2013): Draft Standards for Course Design and Learning Outcomes

Proposed format for the revised standards (including the use of reference points)

Q1. *Do you broadly support the proposed format for the standards? If not, why?*

AHPRA broadly supports the proposed format of standalone standards statements under taxonomic headings and the labelling of points rather than use of bullets. Both these changes provide greater clarity and simplicity than the current format.

The style of the standards statements in the draft Standards for Course Design and Learning Outcomes is inconsistent in terms of active and passive language. For example, statement 2 and statement 7 of the Draft Standards for Course Design (Coursework) both relate to the peak academic governing body but statement 2 uses passive language and statement 7 uses active language. This may impact on the desired simplicity and effectiveness of the proposed format.

The complexity of the standards statements in the draft Standards for Course Design and Learning Outcomes is inconsistent with some standards being simple, clear statements that may be straightforward to assess, whilst others contain multiple concepts or features and may be challenging to assess. For example, statement 3 of the Draft Standards for Course Design (Coursework) specifies eleven features encompassed by course design "... and that these features are documented and publically accessible in a current version...". The inclusion of multiple requirements in a single statement may create a level of complexity that impacts on the ability to assess against the standard.

Q2. *Do you support the inclusion of Reference Points as proposed? If not, why?*

AHPRA supports the inclusion of reference points, particularly the reference to the requirements for professional accreditation in the draft Standards for Course Design and Learning Outcomes.

Q3. *Do you wish to make any suggestions in relation to the format of the standards?*

AHPRA suggests:

- (a) the use of active language wherever possible because it will support simple and clear standards statements
- (b) consideration be given to breaking down complex standards into a series of discrete statements rather than including multiple requirements in a single statement.

The proposed draft standards for Course Design (Coursework)

Q4. *Do you broadly support the proposed standards for Course Design? If not, why?*

AHPRA broadly supports the proposed standards for Course Design subject to the suggestions above about use of active language and avoidance of complexity.

Q5. *Do you wish to make any suggestions in relation to the specific content of the standards?*

AHPRA suggests that:

- (a) processes for quality assurance of course design are dealt with by a separate standards statement rather than included with processes for designing each course of study (in standard 1).
- (b) standard 3 is separated into a series of statements rather than including multiple requirements in a single statement.
- (c) standard 4 refers to "course design" rather than "the nature and scope of the course" because it may be appropriate for other features of course design (not just nature and scope) to be informed by the Australian Qualifications Framework.

The proposed draft standards for Learning Outcomes (Coursework)

Q4. *Do you broadly support the proposed standards for Learning Outcomes? If not, why?*

AHPRA broadly supports the proposed standards for Learning Outcomes subject to the suggestions above about use of active language and avoidance of complexity.

Q5. *Do you wish to make any suggestions in relation to the specific content of the standards?*

AHPRA suggests that:

- (a) references to learning outcomes for each course of study should be consistent and that descriptors such as “specified” and “overall” would preferably be omitted because they are redundant and potentially impact on clarity and simplicity