



Submission by

National Herbalists Association of Australia

**In response to Review of Health Training Package 07
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Executive Summary

- This document has been prepared by the National Herbalists Association of Australia (NHAA), which has represented the interests of professional Western Herbal Medicine (WHM) practitioners and Naturopaths in Australia since 1920.
- The NHAA gives support to the health training package 2007 (HLT07) for the purpose of improving standards in education by promoting an increased consumer/ workforce focussed education sector with an emphasis on quality, and where it is recognised as the minimum standard for the professional qualifications of western herbal medicine and naturopathy.
- The NHAA believes the HLT 07 can be further improved by greater consultation between relevant state, federal and professional bodies.
- The NHAA supports greater consistency in the application of the HLT 07 with auditing and regulation nationally and further support the recommendation of the Review of Australian Higher Education 2008 to expand the national regulatory and quality assurance agency to cover the entire tertiary sector with full responsibility being assumed by the Australian Federal Government.
- While the NHAA supports the current competency based assessment that marks the VET sector we note that this creates obstacles for students seeking entry into higher education. The NHAA suggests a system of concurrent assessment models where both competency and graded assessment are awarded, particularly for Diploma and Advanced Diploma awards to overcome these obstacles.
- The NHAA suggests some changes in unit of competency (UoC) descriptions to increase accuracy of described assessable activities, and be more inclusive of traditional elements of WHM and Naturopathic training.
- The NHAA believes the HLT 07 competencies need to be expanded to reflect underpinning knowledge requirements in science.
- The NHAA notes that recent audits of Registered Training Organisations (RTOs) have included reference to national agreed nominal hours (with preference for National Centre for Vocational Education Research (NCVER)). Some of the indicated nominal hours fall substantially short of membership requirements for professional associations and the proscribed requirements of health funds for provider status. The NHAA requests further consultation in this area.

Introduction and Background to the National Herbalists Association of Australia

The NHAA is the key professional association representing appropriately qualified Western herbalists and naturopaths using herbal medicines as their primary treatment modality. It is the oldest professional association of complementary therapists, founded in 1920, with a current full membership of 988 (our total membership is 1461 including student and companion members). This represents approximately one third of practising herbalists and naturopaths in Australia. The NHAA is the only national professional association specifically concerned with the practice and education of Western herbal medicine (WHM).

The primary aims of the NHAA include to:

- Promote, protect and encourage the study, practice and knowledge of medical herbalism.
- Disseminate such knowledge by talks, seminars and publications.
- Encourage the highest ideals of professional and ethical standards.
- Promote herbal medicine within the community as a safe and effective treatment option.

The Full Membership of the Association elects the Board of Directors of the NHAA, with each member serving a two year voluntary (unpaid) term after which they may stand for re-election.

Full members of the NHAA have completed training in Western herbal medicine sufficient to meet the educational standards as determined by the Examiners of the Board in consultation with tertiary education institutions (standards based on but exceeding the requirements of the NSW Health Training Package), and must adhere to a comprehensive Code of Ethics and Continuing Professional Education (CPE).

Since its inception the NHAA and its members have been at the forefront of herbal medicine and have been influential in areas ranging from education and practice standards, to government regulation and industry standards. The NHAA has a strong commitment to achieving high educational standards in herbal medicine practice and supports regulation of the profession.

Membership is mainly practitioners of Western herbal medicine including naturopaths who choose to use herbal medicine as their major modality of practice.

Review of health Training Package 07

General Discussion

The NHAHA represents the professions of Western herbal medicine and naturopathy and has a vested interest in professional education standards for practitioners of these modalities in Australia

The NHAHA presents this submission for the review of the health training package 2007 (HLT07) on behalf of its partnered training institutions. These institutions have courses in Western herbal medicine (WHM) and naturopathy accredited by both the Vocational Education Training Accreditation Board (VETAB) and the NHAHA.

Whilst the HLT07 is vastly superior to its predecessor, it prompted increased administrative burdens to registered training organisations (RTOs) and in some areas of the HLT07 a loss of flexibility in curriculum design and delivery. This has at times brought the HLT07 into direct conflict with standards for professional accreditation and association membership requirements. This conflict also extends to provision of provider status by participating health funds. This results in fewer RTOs seeking accreditation with professional associations and as such graduates are not assured of membership. As membership of a professional association is a requirement to obtain professional indemnity insurance, a prerequisite for practice under the NSW compulsory code of practice for unregulated health professionals, this may become an obstacle for graduates of these courses to enter practice. The NHAHA acknowledges that these repercussions are not by design but rather due to the complexity of regulation and the variety of stake holders within the VET sector. We see this as an opportune time to implement positive changes under the auspices of the labour government's 'Education revolution' policies, and by giving support to the recommendations made in response to the Review of Australian Higher Education 2008.

NHAHA supports HLT07

The NHAHA broadly supports the function of the HLT07 in bringing a nationally recognised minimum standard to many health professions including WHM and naturopathy. The HLT07 provides both regulatory and financial support to both public and private education providers, improving the quality of education across the board and increasing accessibility to potential students who may not otherwise attempt tertiary education.

NHAHA proposes more industry consultation.

The NHAHA believes HLT07 can be improved by greater industry consultation. Recently there have been an increased number of complaints to the NHAHA by RTOs seeking NHAHA accreditation for their courses; RTOs are finding it more difficult to reconcile their courses to both NHAHA and HLT07 requirements. This is related to the HLT07 design and the subjective interpretation implemented by auditors. This means a course previously meeting the requirements of an accrediting body audit, may be reported as being non-compliant in follow-up audits even though the course content and curriculum has undergone little if any real change.

An example of this has occurred this year. An RTO undergoing an audit was reported non-compliant for having excess hours. This assessment of hours was based on NCVET nationally agreed hours. Unfortunately no one in the profession or the training sector had been consulted with respect to this standard. It is unfortunate that the hours suggested within some areas are not a true reflection of required training hours for admission as a member to a professional association. The increasing number of these conflicts indicates a compelling need for review with further professional

consultation. This proposal is supported by Australian quality training framework's (AQTF) Essential Standards for Registration (2007):

“Element 1.2 Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry stakeholders”
(AQTF 2007)

Greater consistency of regulation and auditing nationally

In spite of AQTF's Essential Standards for Registration (2007) and the AQTF 2007 Audit Handbook guiding state and territory registering bodies through accreditation and auditing activities, there is considerable diversity of interpretation of these guidelines. This observation is based on the range of issues RTOs claim they have in reconciling professional and HLT07 requirements. This differs from state to state. This situation is similar to that reported in the Review of Australian Higher Education: Final Report (Bradley et al 2008). Subsequent recommendations (43, 45) are to expand national regulatory and quality assurance agencies to the entire tertiary education sector under the auspices of the federal government. The NHAA supports these recommendations.

Two-tiered assessment system

The NHAA understands and accepts the advantages of competency based training for the VET sector, but has concerns over the barriers this form of stand-alone assessment presents for students seeking entry into the higher education sector (Bradley et al 2008). The NHAA proposes a two-tiered system of assessment for Diploma and Advanced Diploma qualifications. Such a system will allow for competency based and conventional graded assessment strategies. This suggestion will overcome any perceived obstacles and is backed by the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) national study on credit transfer (Phillip KPA 2006b), which recommended a return to graded assessment for upper levels of VET.

Many students of WHM and Naturopathy pursue the pathway to Bachelor Degree. Many private colleges offering these courses already have partnerships with universities to enable their students to pursue higher awards. It is the NHAA's view that in the near future a Bachelor Degree will become the minimum standard for practice. Industry interpretation foresees the need for this qualification as a pre-requisite for the registration of WHM and Naturopathy.

The practice of WHM and Naturopathy is integrating more emphasis on evidence based education, with a higher degree of academic skills and scientific endeavour being required for safe practice. This movement is not well supported by competency-based assessment alone.

Therefore any regulatory policy or interpretation of policy that negates an RTO's intent to use both forms of assessment is not in the best interests of public safety or the profession, and goes against current reported evidence in this area.

Accurate descriptions of units of competency (UoC)

VETAB accreditation and auditing groups state a preference for single subjects to represent each competency. Unfortunately competencies are poorly designed for this purpose.

For example the UoC **HLTHER603B - Operate a western herbal medicine dispensary** relates to some (though not all) elements of Herbal botany and plant ID (NHAA 2007), and most elements of manufacturing and processing (NHAA 2007). As such RTOs are presented with a quandary as to mapping two traditionally separate teaching areas effectively and meet the requirements of VETAB and the professional associations.

Similarly elements of the traditional subject herbal therapeutics can be found in several UoC including:

HLTER608B - Provide specialised western herbal medicine treatment
HLTER606B - Prepare and dispense western herbal medicine
HLTER609B - Provide the western herbal medicine treatment

These UoC also describe elements of clinical practice.

Meanwhile the core subject materia medica cannot be clearly mapped, leading to RTOs using some imaginative UoC allocation. In fact the only reference to herbs themselves occurs in ***HLTER608B - Provide specialised western herbal medicine treatment***, where 130 herbs are listed in the variable section of the competency. Therefore it is considered underpinning knowledge, though one wonders from where this knowledge is supposed to be obtained.

None of this would be a problem if the limitations of the competencies were recognised by assessors. However, we suggest that a more useful solution to this problem would be to either modify current UoC or create new ones.

Expansion of competencies

The practice of WHM and naturopathy is becoming more evidenced based and has a higher degree of scientific knowledge required for safe practice (e.g. drug/ herb interactions, phytochemistry, and research). RTOs report this area of training becoming one of conflict between the profession and the HLT07.

In 2002 the NHAA undertook an industry consultation process that resulted in the NHAA Course Accreditation System (CAS 2007) which outlined the minimum training requirements in WHM and Naturopathy. The information ascertained needs to be supported with subsequent expansion of competencies within the HLT07 to cover areas including;

- Chemistry/ biochemistry
- Pharmaceutical pharmacology
- Herb pharmacognosy and pharmacology

The more traditional subject of botany and plant ID remains incompletely represented in current competencies, also requiring rectification.

NCVER nationally agreed nominal hours

Recent audits have seen RTOs expected to comply with state and national nominal hours with a preference stated for NCVER hours (VETAB report for college, October 2009). This is of concern to the NHAA as there was no consultation of the impending implementation of these hours, and they do not represent current profession associations' recommended hours across all areas. For example;

- Manage the control of infection (NCVER 50 hrs) seems excessive for professions that may never/rarely handle body fluids and sharps, and is covered in OH&S and clinical practice, but might be appropriate for acupuncturists and venupuncturists.
- Communicate effectively with clients (NCVER 30 hrs) is half the NHAA required hours for professions who advocate dealing with the client 'holistically.'

The NHAA understands that this is likely to have been implemented to prevent over-teaching/over-charging by RTOs, however tight regulation of hours reduces course flexibility and impacts curriculum design, which may in turn negatively disadvantage the RTO commercially. The NHAA is not opposed to some nationally approved guidelines to be used as a guide, but would prefer these hours be developed in consultation with the profession rather than be arbitrarily stated and applied.

The subjective nature and application of these training hours by registering authorities will lead to a reduction in course hours, particularly for naturopathy. This will adversely impact graduates of these courses, whom will not be able to obtain provider status with some health funds which have set requirements above the HLT07 for provider recognition. This will present a barrier to entry into the profession for graduates, requiring them to seek post-graduate training to meet minimum professional standards.

Summary of Recommendations

1. Further consultation with the professions to reconcile the HLT07 with researched professional requirements (NHAA 2007), with the aim of reducing potential conflicts between the HLT07 and professional accreditations for RTOs, and improve training outcomes for students.
2. The NHAA supports the aim of increasing consistency of accrediting and auditing activities as recommended by the Review of Australian Higher Education: Final Report (Bradley et al 2008) to expand national regulatory and quality assurance agencies to the entire tertiary education sector under the auspices of the federal government. .
3. The NHAA supports the development of a two-tier assessment model allowing for both competency based and graded assessment, to facilitate student pathways into the higher education sector.
4. The NHAA recommends further consultation to more clearly define current units of competency that more accurately reflect traditional professional training elements. This will reduce RTO confusion in mapping required elements.
5. The NHAA supports an expansion of units of competency to reflect the increasing academic and scientific requirements of WHM and Naturopathy, to support future professional goals.
6. The NHAA strongly supports ongoing consultation in the development of nationally agreed hours that more accurately reflect professional requirements than those currently proposed by NCVET.

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