



Review of the Australian Qualifications Framework

Discussion Paper

DECEMBER 2018

The Australian Qualifications Framework (AQF) Review Panel wishes to draw on the considerable expertise and experience that has developed across a broad range of organisations and individuals in relation to the Review's [Terms of Reference](#).

In its discussion paper, the Panel has opted to provide to organisations and individuals some of the Panel's initial thinking about the case for change to the AQF, but invites differing analysis, conclusions and proposals.

To make a submission to the Review, please email this form to AQFReview@education.gov.au by 15 March 2019.

Please note that the Australian Government Department of Education and Training will not treat a submission as confidential unless requested that the whole submission, or part of the submission, be treated as such.

Please limit your response to no more than 3000 words.

Respondent name

Alan Merritt, Manager, Medical School Accreditation

Respondent organisation (where relevant)

Australian Medical Council

The AMC is the national standards body for medical education and assessment. Its purpose is to ensure that standards of education, training and assessment of the medical profession promote and protect the health of the Australian community. It has operated as an assessment and accreditation authority for the medical professional education since 1985. In 2010, the Health Practitioner Regulation National Law (the National Law) came into effect, and the AMC became the designated accreditation authority for the medical profession in the National Registration and Accreditation Scheme established by that National Law.

The AMC accredits more than 126 primary and specialist medical programs offered by 40 education providers based in Australia and New Zealand. There are differences in the definition of an education provider so that the organisations regulated by Tertiary Education Quality and Standards Agency (TEQSA) and accredited under the National Law are not the same. The TEQSA Act definition of a higher education provider links to the provider conferring a regulated higher education award. The definition of an education provider under the Health Practitioner Regulation National Law is broader: it includes (a) a university; or (b) a tertiary education institution, or another institution or organisation that provides vocational training; or (c) a specialist medical college or other health profession college.

The AMC's functions include:

- improving health through advancing the quality and delivery of medical education and training associated with the provision of health services in Australia and New Zealand
- acting as an external accreditation entity for the purposes of the Health Practitioner Regulation National Law
- developing accreditation standards, policies and procedures for medical programs of study based predominantly in Australia and New Zealand and for assessment of international medical graduates for registration in Australia
- assessing programs of study based predominantly in Australia and New Zealand leading to general or specialist registration of the graduates of those programs to practise medicine in Australia to determine whether the programs meet approved accreditation standards, and to make recommendations for improvement of those programs
- assessing education providers based predominantly in Australia and New Zealand that provide programs leading to registration of the graduates to practise medicine in Australia, to determine whether the providers meet approved accreditation standards
- advising and making recommendations to regulatory authorities and government
- working with international health, accreditation and testing authorities and agencies to bring about improvement in the furtherance of these objects.

As an accreditation authority operating under the National Law, the AMC reports regularly on its work to a National Board, the Medical Board of Australia. It is important to note, in the context of this consultation, that the AMC is not a professional body representing the interests of its members or a profession, it is an accreditation authority with roles covered by national legislation.

1. In what ways is the AQF fit, or not fit, for purpose?

The AMC considers that in its current form, the AQF is fit for purpose.

The AMC acknowledges the areas identified for consideration in the discussion paper and believes that care must be taken that any unintended implementation of changes to the types of qualifications to which the AQF extends does not diminish the effectiveness of the overall higher education framework.

Shorter form credentials in both higher education and the professional context have the potential to impact on the overall outcomes of medical education programs by fragmenting programs, which are integrated in that they build on learning across modules and over years.

Currently there is significant layering of learning across multiple course components and the program as a whole. While recognition of prior learning is currently an adequate mechanism for endorsing a student's skills and knowledge within a program, a collection of micro-credentials has the potential to limit this type of programmatic learning through disconnecting various components from the whole.

2. Where the AQF is not fit for purpose, what reforms should be made to it and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in the discussion paper and other approaches.

The AMC response is against each of five areas for possible change.

1. A wider range of credentials could be included in the AQF

a. In higher education

The AMC is responsible for the accreditation of primary medical education programs that are situated exclusively in Australian and New Zealand universities. These education providers currently have structures and processes in place for both developing and delivering, and recognising learning from short-form courses within the current higher education standards framework.

On the surface, aligning short-form courses offered within the higher education sector with current AQF offerings may in many ways be helpful for students and in ongoing professional development. However, there is potential that short-form courses may fragment medical programs through microcredentialling of specific knowledge or skills and minimize the ways in which this knowledge is carried through and built upon in a whole-of-program sense.

Care must be taken to ensure that overall program learning outcomes are protected, and short-form courses are assessed as applicable to the components of a program in ways that are clear and consistent with current RPL processes to ensure that the learning is equivalent to the needs of the program.

b. In professional contexts

Not all education providers under the National Law seek the status of registered higher education provider with TEQSA or offer a higher education award. For medicine, only primary medical programs, which lead to provisional registration as a medical practitioner, result in a qualification under the Australian Qualifications Framework and are delivered by higher education providers.

The AMC is also responsible for the accreditation of specialist medical education training provided by Specialist Colleges and for the quality assurance of other medicine-specific review processes. The AMC accredits state-based authorities that set standards for medical internship; Workplace Based Assessment programs for international medical graduates and Pre-employment Structured Clinical Interviews undertaken by international medical graduates.

Short form courses are provided within these contexts as continuing professional development or as mandatory components of a program.

Currently the AMC is responsible for assessing shorter form courses that form an integral part of an education program as a part of our primary purpose. The standards for these courses are set relative to the level required to acquire or maintain professional registration. This arrangement is currently working well. The AMC believes that further governance in assessing these programs is not required and any proposed changes in this context should be mindful of unforeseen impacts in terms of duplication quality assurance processes.

The AMC is supportive of an approach that minimises any additional quality assurance requirements and utilises arrangements with existing bodies for this purpose.

2. Enterprise and social skills

The AMC is supportive of expanding the recognition Enterprise and Social Skills in the AQF. Human and professional skills have long been valued and incorporated as specific program outcomes in medical education programs. Incorporating these attributes into the AQF is a

positive statement on the importance of professionalism, empathy and other humanistic behaviours in graduates.

The AMC graduate outcome statements, incorporated into the Standards for the Assessment and Accreditation of Primary Medical Programs by the Australian Medical Council 2012, incorporate specific expectations of graduates' enterprise and social skills.

The AMC also agrees that enterprise and social skills are context specific, and guidance related to delivery for specific qualifications would be a more helpful way of recognising these important outcomes rather than reflecting them in a taxonomy..

3. AQF taxonomies and levels

The AMC is supportive of simplifying and clarifying the AQF where appropriate. The AMC agrees that learning is context specific, and approaches to describe the application of knowledge and skills, in the appropriate context is supported.

The AQF level 9 Extended qualification is well utilised by medical schools and the AMC would expect to see this retained.

4. Senior secondary school certificate

The AMC does not have an opinion on this aspect of the discussion paper.

5. Volume of learning

The AMC is supportive of framing the volume of learning for a qualification in terms of the needs of a new learner.

The AMC agrees that framing volume of learning in terms of years rather than creditpoints is not in keeping with current flexible learning approaches.

AMC accreditation standards require a medical program to be of sufficient duration to ensure that graduate outcomes can be achieved. In the context of the education of medical students, this encompasses more than the academic load at University and includes clinical placements, research activity and community engagement activities.

The AMC is strongly supportive of approaches that are conducive to the student achieving the program learning outcomes in a complex academic and professional context, that will ensure that learners have adequate time to achieve the learning outcomes of the program.

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts.

The AMC commends the review panel on their thoughtful approach to this review.

The AMC is supportive of the approach to governance that is cognisant of existing quality assurance processes and seeks not to increase bureaucracy for education providers.

Other

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