



Consultation Document:

Proposed vocational scope of practice in child and adolescent health, and proposed prescribed qualification for registration in that scope of practice

October – December 2016

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Introduction

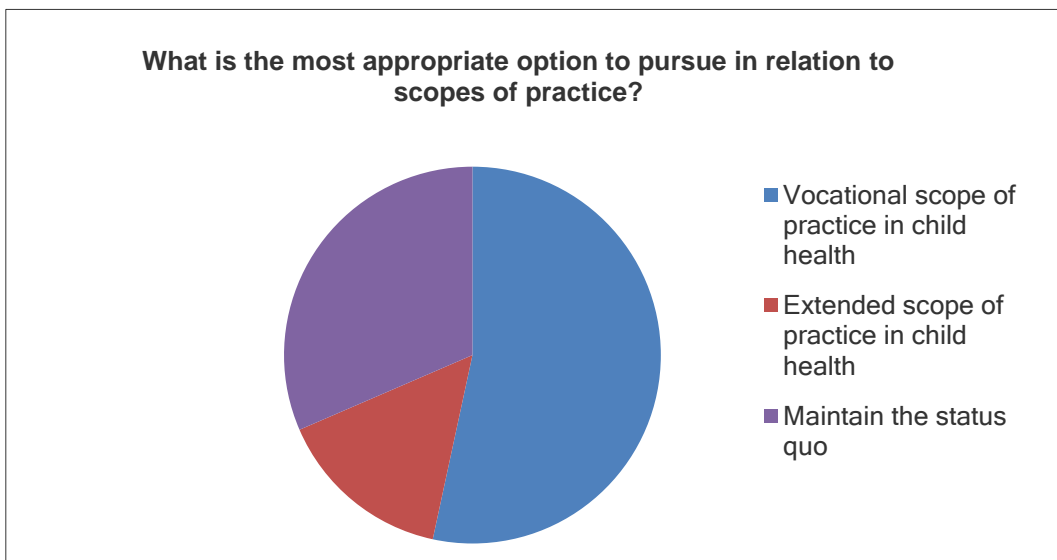
1. Between September and November 2015, the Council consulted with stakeholders on a number of issues relating to child and adolescent health. One of the issues canvassed was whether it would be appropriate to introduce a new vocational scope in child and adolescent health, and if so whether any of the provisionally identified qualifications would be suitable as a prescribed qualification in that scope of practice.
2. Having undertaken further research into this matter, the Council is now proposing to introduce a vocational scope of practice in child and adolescent health, and to prescribe one qualification for registration in that scope of practice. It is possible that further qualifications may be identified and prescribed at a later date.
3. This document sets out the background to this issue, and the Council's proposal, as required under section 14 of the Health Practitioners Competence Assurance Act 2003 (the Act) to gazette a new scope of practice under section 11 of the Act, and a new prescribed qualification for that scope of practice under section 12 of the Act.
4. The closing date for submissions is **5.00 pm on Friday 9 December 2016**. All responses should be sent to submissions@ocnz.org.nz.

Background

5. The Council is charged under the Act with protecting public health and safety by ensuring that osteopaths are competent and fit to practise their profession. The Council has a range of obligations in this regard, as set out in section 118 of the Act, as follows:
 - (a) to prescribe the qualifications required for scopes of practice within the profession, and, for that purpose, to accredit and monitor educational institutions and degrees, courses of studies, or programmes:
 - (b) to authorise the registration of health practitioners under the Act, and to maintain registers:
 - (c) to consider applications for annual practising certificates:
 - (d) to review and promote the competence of health practitioners:
 - (e) to recognise, accredit, and set programmes to ensure the ongoing competence of health practitioners:
 - (f) to receive and act on information from health practitioners, employers, and the Health and Disability Commissioner about the competence of health practitioners:
 - (g) to notify employers, the Accident Compensation Corporation, the Director-General of Health, and the Health and Disability Commissioner that the practice of a health practitioner may pose a risk of harm to the public:
 - (h) to consider the cases of health practitioners who may be unable to perform the functions required for the practice of the profession:

- (i) to set standards of clinical competence, cultural competence, and ethical conduct to be observed by health practitioners of the profession:
 - (j) to liaise with other authorities appointed under the Act about matters of common interest:
 - (k) to promote education and training in the profession:
 - (l) to promote public awareness of the responsibilities of the authority:
 - (m) to exercise and perform any other functions, powers, and duties that are conferred or imposed on it by or under the Act or any other enactment.
6. In 2010, the Council commenced a project to explore the nature and extent of child and adolescent osteopathic practice in New Zealand, and to consider the necessary capabilities required for osteopaths wishing to treat child and adolescent patients. Research and developments in this area have been ongoing since then.
 7. Results of a workforce survey undertaken in 2014 indicated that the majority of osteopaths considered the development of a vocational scope in child and adolescent osteopathy to be of high or medium priority (176 of 274, or 64% of all osteopaths who responded to the question).
 8. In a further survey of the profession undertaken during the September - November 2015 consultation, there was general support for development of a vocational scope in child and adolescent health, as set out in Chart 1 below.

Chart 1:



Proposed introduction of a vocational scope of practice in child and adolescent health, and a prescribed qualification for registration in that scope of practice

Vocational scope

9. At its meeting on 22 February 2016, the Council considered submissions on its last consultation, which included questions about whether it should introduce a new scope of practice in child and adolescent health. It agreed that the option of introducing an *extended* scope of practice in child and adolescent health (that is, a scope of practice that limits performance of tasks only to practitioners who are registered in that scope of practice) would not address public health and safety needs. In particular:
 - (a) Although there are concerns about the current state of skills and knowledge amongst the general profession in this area, the Council has an obligation to apply the least regulatory force necessary to achieve safety. The evidence available at the moment does not indicate that there is a need to stop all osteopaths who do not have specialist training in child health from treating children; and
 - (b) There are risks that limiting the treatment of children only to osteopaths with advanced (i.e. postgraduate) training in child health would reduce access to osteopathic care for child and adolescent patients to an unacceptably small number of practitioners. Over time, such a move would result in lack of exposure of osteopaths registered in the general profession to child and adolescent patients, and this in turn would erode the skills and knowledge already held by these osteopaths in this area. In the long term, this would likely prove detrimental both to the profession and the public.
10. The Council preferred an approach that would foster continued development and learning, as well as intra-professional liaison between practitioners with advanced training and those without.
11. With this in mind, the Council agreed, in principle, that any specialist scope of practice developed should be a vocational scope of practice, not an extended scope of practice. Having formed this view, the Council agreed that there was likely to be benefit to the public in having access to osteopaths recognised as having specialist skills in child health, and that it appeared to be worth pursuing the development of a vocational scope of practice in child and adolescent health; however it noted that this could not proceed unless the Council was able to identify an appropriate qualification or qualifications for registration in that scope of practice.

Prescribed qualification

12. In the lead-up to its initial September – November 2015 consultation, the Council had identified two qualifications that, upon preliminary review, it considered may be appropriate as prescribed qualifications for registration in a vocational scope in child and adolescent health, and sought views from stakeholders on the appropriateness of these qualifications for the intended purpose. These qualifications were:
 - (a) Postgraduate Diploma in Health Sciences with a specialisation in Child Health from AUT; and
 - (b) Postgraduate Diploma in Child Health from the University of Otago.

13. Feedback received on these qualifications included:
 - a) Views that perhaps a PGDip in child and adolescent health may be too generic to add value, as it is not specific to osteopathy
 - b) Views that the qualifications identified appeared appropriate
 - c) Views that there would be a need for a significant practical component in any specialist training.

14. The Council also noted details of other courses that might be suitable, including:
 - a) the Neonatal and Infant Paediatric Manual Therapy course run by Victoria University in Melbourne
 - b) an unnamed UK based 2 year paediatric programme
 - c) a course developed by Massey University
 - d) A course developed by CPIT
 - e) A course developed by Unitec
 - f) A suggestion that osteopaths with significant experience in child and adolescent health should be grandfathered into a specialist scope of practice.

15. The Council considered the new suggestions and agreed that recognition of previous experience, without formal qualifications, would not be a suitable approach. First, it would not be consistent with already approved vocational scopes for the Council to introduce a process of evaluating individual portfolios of experience for the purposes of determining whether a practitioner has sufficient background to qualify as a “specialist” in child and adolescent health. Second, it is important, in terms of public confidence, that the Council, and individual practitioners, can demonstrate to the public that those practising in a “specialist” scope of practice hold formal and recognised qualifications that have undergone appropriate accreditation processes. It was noted, however, that when considering applications for enrolment in their programmes, training institutions may recognise prior learning as part of the application process. This would be a matter for the individual training institution; it would not be appropriate for the Council to interfere in those enrolment processes.

16. The Council also agreed that some of the formal qualifications suggested by respondents should be investigated further before any decisions were made in relation to the development of a vocational scope of practice in child and adolescent health, noting that a critical question still to be answered was whether there was one or more qualifications that appeared to be appropriate for registration in that scope of practice.

17. The Council therefore decided to gather more information on the availability or otherwise of courses at Postgraduate Diploma level that might be suitable.

18. The Council approached training institutions suggested by the profession (Ara (formerly CPIT), Unitec and Victoria University in Melbourne) to query the possibility of developing an appropriate qualification. Each of these institutions has either indicated that it is not in a position to develop an appropriate qualification, or has not provided sufficient information to the Council about qualifications that may be suitable.

19. Council representatives met with faculty at AUT on 19 August 2016 to discuss questions raised by the profession in response to the Council initial consultation question on whether AUT's Postgraduate Diploma in Health Sciences (Child Health) would be an appropriate fit for a vocational scope of practice in child and adolescent health. In particular, the Council raised the question of the suitability of the programme for osteopathy.
20. AUT advised that its usual practice is for each candidate to be personally guided by faculty in the selection of courses that are appropriate to their profession, and there is flexibility within the programme to ensure that content is relevant to all students. AUT is confident that its current programme can readily be applied to osteopaths.
21. The Council also noted that the qualification can be largely delivered online, with three day block sessions on site at AUT. This means that it can be accessible to all members of the profession.
22. Having already undertaken a review of the course content prior to the September – November 2015 consultation, the Council is satisfied that AUT's Postgraduate Diploma in Health Sciences (Child Health) would be fit for purpose in this regard.

Council obligations when prescribing a qualification

23. Section 13 of the Act requires that when prescribing a qualification, the Council must be guided by the following principles:
 - (a) The qualifications must be necessary to protect members of the public; and
 - (b) The qualifications may not unnecessarily restrict the registration of persons as health practitioners; and
 - (c) The qualifications may not impose undue costs on health practitioners or on the public.
24. In relation to 21(a) above, the Council is of the view that formal post-graduate qualifications are required for registration in any of its vocational scopes of practice in order to provide adequate protection for the public. The reason for this is that the stated purpose of a vocational scope is to allow members of the public / referring healthcare professionals to identify osteopaths on the register with advanced standing in a sub-domain of practice. Where the public is able to search for practitioners with "advanced standing" the Council needs to have systems in place to assure the public that those practitioners have formal and identifiable qualifications that justify recognition of that advanced standing.
25. The Council has historically set this standard at Postgraduate Diploma level when setting new scopes of practice, and is of the view that this remains the appropriate standard, which should be consistently applied across all vocational scopes of practice.
26. In relation to 21(b) above, the Council notes that the introduction of a vocational scope of practice in child and adolescent health in no way affects the registration status of osteopaths in the general scope of practice; those osteopaths can continue to practise to the full extent of that scope of practice. Obtaining prescribed qualifications and registering in a vocational scope of practice is entirely voluntary. With this in mind, the Council is satisfied that its proposal will not unnecessarily restrict the registration of persons as osteopaths.

27. In relation to 21(c) above, the Council notes that AUT's domestic fees for this qualification are currently set at \$1,026 per 15 points. A total of 120 points is needed for completion of the qualification, which amounts to \$8,208 in fees. The Council understands that these fees are commensurate with fees charged at other training institutions for postgraduate health qualifications, including:

Training Institution	Fees per 120 credits
Massey University (Postgraduate Nursing fees)	\$6,770.70 - \$8,793.70
Ara (PGDip Health Science)	\$6,840 (indicative)
University of Otago (Postgraduate Health Sciences)	\$10,560

28. Based on this information, the Council is satisfied that AUT's Postgraduate Diploma in Health Sciences is appropriately priced. Further, there is no undue cost imposed on osteopaths or the public because enrolment in this course is not compulsory for the continue practice of osteopathy in New Zealand. As noted above, the course is optional for those osteopaths who wish to obtain recognition as advanced osteopathic providers of child and adolescent health services.

Proposed Gazette Notice

29. The Council proposes to publish a notice in the Gazette with the following contents:

Scope of practice – Vocational scope of practice in child and adolescent health

Pursuant to section 11 of the Health Practitioners Competence Assurance Act 2003, the Osteopathic Council of New Zealand has specified the vocational scope of practice in child and adolescent health as follows:

The purpose of a vocational scope of practice is to allow members of the public / referring healthcare professionals to identify osteopaths on the register with advanced standing in a specialist area of practice.

Council recognises that there is a continuum of skill and expertise acceptable in the area of practice and it is explicit that the pre- registration training in the General Osteopathic Scope of Practice gives the registrant adequate skills to be competent but that advancement in a particular area of practice may develop over time and with further study.

The vocational scope of practice in child and adolescent health allows Council recognised post-graduate study in child and adolescent health, combined with relevant clinical experience to be reflected on the register. Patients and referring healthcare professionals will be able to identify registrants who are registered in this scope of practice.

Osteopaths who are registered in the vocational scope of practice in child and adolescent health have obtained qualifications, in addition to their general osteopath qualification, that focus on the osteopathic treatment of 0 - 18 year olds.

Prescribed qualification for registration in the vocational scope of practice in child and adolescent health

Pursuant to section 12 of the Health Practitioners Competence Assurance Act 2003, the Osteopathic Council of New Zealand has prescribed the following qualification for registration in the vocational scope of practice of child and adolescent health:

Applicants for registration in the vocational scope of practice in child and adolescent health must:

- (a) Be registered in the General Osteopath scope of practice; **and**
- (b) Hold a Postgraduate Diploma in Health Science in Child Health awarded by Auckland University of Technology.

Consultation questions

1. Do you consider the contents of the proposed Gazette notice in relation to the new vocational scope of practice in child and adolescent health to be appropriate? Please give reasons for your view.
2. Do you consider the contents of the proposed Gazette notice in relation to the prescribed qualification for registration in the vocational scope of practice in child and adolescent health to be appropriate? Please give reasons for your view.
3. Do you believe that the Council needs to take any other considerations into account with regard to the principles of section 13 of the Health Practitioners Competence Assurance Act 2003 (set out in paragraph 21 above) before making a final decision on whether to set the new vocational scope of practice in child and adolescent health and to prescribe the proposed qualification for registration in that scope of practice? Please give reasons for your view.

Conclusion

The Council welcomes your feedback on this consultation. Details of how to make a submission are included on page 3 of this document. Any submissions made after the deadline cannot be guaranteed to be included in the Council's deliberations on this matter.