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30th August 2014

Mrs Nicola Burridge
Consultant
Community Services & Health Industry Skills Council
PO Box H61
AUSTRALIA SQUARE NSW 1215

RE: Impact on industry due to the impending withdrawal of Advanced Diplomas.

Dear Nicola,

I write regarding our associations concern for the future of the natural medicine industry as a result of the decision taken by the Complementary & Alternative Health Industry Reference Group (IRG) to remove the advanced diplomas of Homeopathy, Naturopathy, Nutritional Medicine and Western Herbal Medicine.

We note in your status report to the Complementary & Alternative Health IRG and Subject Matter Expert Groups (SMEGS) that you agreed to accept any additional information by 1 September 2014. The Australian Traditional-Medicine Society Ltd (ATMS) takes this opportunity to provide information for the consideration of all parties involved in the deliberations.

ATMS unequivocally confirms its support for the current two tiered qualification framework for Homeopathy, Naturopathy, Nutritional Medicine and Western Herbal Medicine. ATMS proposes that the advanced diploma qualification (AQF6) should remain as the entry level to the professions and co-exist with a degree qualification as is the present situation. The current two tiered framework has served the natural medicine industry adequately for approximately eighteen years.

This proposed change comes at a time where the CAH industry is shrinking in size, yet the demand for natural medicine treatments are on the increase. ATMS suggests the reason for the growth in our industry is reflected by the successes CAH practitioners have in the treatment of the public and their health care needs.

When we state the industry is shrinking it is meant that the total number of practitioners available to treat the public is in decline, partly due to Australia's ageing demographic and the ageing demographic of practitioners currently in practice approaching or at retirement age. This we believe would be seen across the majority of associations with reduced new membership applications. The proposed removal of the advanced diplomas we suggest will further diminish an industry already under impact from private health fund reform and what is essentially a predictable skill shortage. In the CS&HISC own You Tube link – *Time for Action*; it clearly states that there is a place and need for both VET and HE qualified professionals for the future of health care.

The advanced diplomas are work/employment ready qualifications; they do not require research units. There are no readily available internships or placement opportunities for CAH practitioners as the work/employment ready aspect of their learning is completed within the advanced diploma.

We highly suggest there has not been sufficient visibility to the IRG around the impact of the removal of the advanced diplomas. Realignment appears to have had visibility, removal however has not. IRG members were advised that the objective of the committee was to provide input to the CS&HISC to assist them to review courses to ensure that they were at the appropriate level and in line with the Australian Qualifications Framework (AQF). Further we believe there has been a lack of robust discussion by the IRG in relation to the removal of the advanced diplomas from the CAH sector. From our discussion with some members of the IRG there appears that there are concerns amongst them and other stakeholders regarding the removal of the advanced diplomas, which have not been taken into account. The decision however has been made on apparent technical language incompatibility used in the qualifications descriptor in AQF and the performance of advanced diploma holders. We suggest these descriptors are ambiguous and subject to individual interpretation.

ATMS is of the opinion that there are clearly two very different educational level; being the AQF6 advanced diploma level with outcomes at the practitioner level, retail support and advice roles in health food shops and pharmacies and the AQF7 degree; which is targeted for ongoing research or business development within manufacturing. ATMS's position is that the AQF6 advanced diplomas should remain in place and be reviewed to ensure it reflects the necessary outcomes for our industry's requirements.

ATMS strongly believes that there is a need to retain the AQF6 qualifications as many other industries have entry level VET sector qualifications that allow for the underpinning knowledge that lead to pathways in higher education at AQF7. Examples of this are nursing, engineering, marketing and business administration to name but a few. One of the most essential aspects that support these qualifications remaining in the VET sector is the existence of current pathways to degrees.

Removing advanced diplomas from the training packages will not serve the industry as there will be no demonstrated pathway to the degree level. There are few 'professional' education pathways that do not incorporate a vocational level of training. Many universities have embraced the idea that most professions can be serviced with both VET and HE qualifications.

Unlike other medical and paramedical professions, there are no readily available job opportunities for natural medicine practitioners. Many create their own opportunities and become self-employed practitioners. Under such circumstances, making the degree the only qualification achievable adds considerable financial burden and time commitment which could potentially discourage students enrolling in future training and result in a further shortage of the practitioners.

Those in the collaboration of associations group, whilst accepting that the current practitioner is of an exceptional standard are also misguided to believe that private health funds will continue to accept their members at a lower qualification level. History has shown that it is highly likely private health funds could expect degree level for a practitioner to maintain private health fund eligibility. As private health funds do not offer a grandfathering system there are no guarantees that practitioners without degrees will retain their current status.

Potentially numerous long standing practitioners may be forced into upgrading their qualifications to retain their professional status, a decision not taken likely as we estimate that the cost to upgrade their industry qualification could be approximately \$40,000-\$55,000. This could perhaps be even more if educational institutions do not recognise their prior learning and/or clinical experience, a problem already manifesting itself at this current time.

A further concern is that of the number of individuals suitably qualified to teach at an AQF7 level and the number of educational institutions available to offer programs at this level. As stated the industry is in decline and the removal of a qualification level that is not only suitable, affordable and accessible needs to be maintained and the need for it remain at the forefront of the industries rebuilding strategies. The ability to satisfy the demand for enrolments across all modalities into the future at an affordable price is a further concern for ATMS.

ATMS, although highly respectful of our colleagues, has concerns that the composition of the Complementary & Alternative Health IRG adjudicating over this significant matter are predominantly representative of bodywork associations whereas the impact of this decision has potential impact on the ingestive practitioner members within our industry. It is imperative that the IRG are provided with adequate and all the information prior to making a decision and we suggest this has not been provided to them.

With due respect, ATMS also has concerns regarding misleading information provided to CS&HISC regarding the professions and the industry for natural medicine. We take this opportunity to provide an overview of our understanding of the present representation of the natural medicine industry, bearing in mind that the industry encompasses practitioner members of associations, RTOs and the complementary medicines industry. ATMS represents approximately 7,200 ingestive practitioners which you will see from the table below exceeds the total of the other five associations.

Association	Total approximate membership	Estimated Ingestive Practitioners
Australian Traditional Medicine Society (ATMS)	12,200	7,200
Australian Natural Therapists Association (ANTA)	5,900	3,400
Australian Naturopathic Practitioners Association (ANPA)	250	250
AROH	650	650
CMA	140	140
NHAA	2,200	2,200
TOTAL	21,340	13,840

Ingestive Modalities	Number of ATMS qualifications
Western Herbal Medicine	3,504
Naturopaths	2,543
Nutrition	2,316
Homeopaths	1,458
TOTAL	9,821

Note: ATMS members have qualifications that cross several modalities

ATMS is a significant voice. As the largest professional association representing Complementary and Alternative Health, ATMS is a major, legitimate stakeholder in the CS&HISC review. As such we strongly believe that we have a right to participate in this important review. Our members, educational institutions and course providers rely on ATMS to represent them in any review of professional standards.

It has been widely stated that the industry needs to move toward Statutory Registration to protect the public and therefore to do so we require all graduates to be at the degree level. There is no valid evidence that the regulators are interested in registering natural medicine practitioners in a climate where there is a lack of political support. The only driver to this change is the AQF level. The public and government are not championing the change as all four modalities are deemed safe to the public. This is also reflected by insurance companies.

ATMS's major concern is that the industry risks losing potential future practitioners with dedication and true passion for the industry. We look forward to being actively involved in any further discussions regarding the reinstatement of the advanced diplomas to our industry.

Yours sincerely,

Trevor Le Breton

Chief Executive Officer

Cc: Rod Cooke – CEO CS&HISC

Dorothy Rao – Manager Training Packages CS&HISC

Additional information

Natural medicine health care plays an important role in the prevention and management of a broad range of health conditions. It is well documented that Australia has an aging population, and that health care in the near future will experience a dramatic increase in demand for health professionals of all types.

It is expected that AQF6 graduates will have broad knowledge and skills for para-professional/highly skilled work and/or further learning; whereas an AQF7 graduate will have broad and coherent knowledge and skills for professional work and/or further learning. The key difference is the term para-professionals as the definition states in the oxford dictionary for para-professional – ‘a person to whom a particular aspect of a professional task is delegated but who is not licensed to practice as a fully qualified professional’. Existing complementary medicine practitioners are not licensed so there is no issue with being classified a para-professional.

The following table shows the number of students enrolled in 2013 in three of the four advanced diplomas at VET level. There is no evidence of homeopathy enrolments nor were statistics available at HE level despite a request for these to be released.

Statistical breakdown of existing enrolments for advanced diploma's 2013

QUALIFICATION	HLT 60512 NATUROPATHY	HLT60112 WESTERN HERBAL MEDICINE	HLT61012 NUTRITIONAL MEDICINE
Number enrolled	80	23	63
Male /Female split	6/74	0/23	5/58
Number under 25 years	21	1	9
Number with existing Qualifications above advanced diplomas in another discipline	29	0	23

If practitioners were required to upgrade to the proposed degree level to retain private health fund's status this would be a significant impact on the livelihoods of members as we believe the majority have neither the time nor capacity to pay for such an upgrade. Even though HEX or Fee help may be available this in reality is a substantial deferred debt with interest.

Quality of graduates

The question for our industry is at what level of quality should our future practitioners to be at, and how will this be achieved. ATMS believes this is where the work of the SMEG needs to focus, to separate the two and ensure that the quality of the practitioner is maintained or improved where necessary. The simple inclusion of research and/or elective units at the degree level will not improve the standard or change significantly the natural medicine knowledge of a practitioner in our opinion. Industry needs to determine the content for the courses and ensure the content is relevant and representative of what the natural medicine industry requires.

Equity and Access to education in Natural Medicine

ATMS has significant concerns for the industry's ability to provide sufficient access to education at the AQF7 level. There are presently an insufficient number of colleges as well as a dearth of suitably qualified lecturers to educate the future practitioners of our industry at AQF7.

Additionally the cost for colleges to apply to have the AQF7 qualifications added to their scope is prohibitive but the cost to potential new entrants into our industry is restrictive. Our research advises that it is likely to be on average an additional cost of above \$40,000- \$55,000 for a student to undertake study at the degree level. Assuming the student can't pay that amount up front, there are additional Fee Help charges of approximately 20% on top of all course borrowings. Interest rates on Fee Help are also going to increase as stated in the new budget to

approximately 6% or the government bond rates, further driving up course costs and turning away potential entrants from considering a career in natural medicine.

Additionally recent education reforms introduced by the present federal government will see students having to repay these loans sooner. The full advanced diploma of Naturopathy costs (full price including all text books and enrolment fees) is currently approximately \$23,000-35,000.

In summary, most students don't have the approximately \$35,000-55,000 (new degree entrant) to pay for a degree course outright or pay it off at approximately \$12,204 per year. Under the proposed changes a student would be forced to take out a fee loan that is accruing interest at just below approximately 6% per annum that they have to pay back as soon as they earn \$50,000 per annum. To upgrade an existing advanced diploma qualification to a degree would cost in the vicinity of \$15,000-\$20,000. To upgrade to a degree from an industry qualification, the cost has been quoted at approximately \$45,000-55,000. The difference in these fees is substantial and this could deter a considerable number of potential students away from the industry.

To repay a student loan within 7 years (i.e. Fee Help), the new graduate may have to find approximately \$1,017 per month for payments. This is on top of well known existing start up costs for a business. It is presently proposed that the threshold at which the loan must be repaid be dropped to approximately \$50,638 which signifies a further restriction to education.

New graduates will be competing against practitioners who are established and have no student loan to pay back providing them less viability for self-employment.

Note: all costs are presented in good faith as all educational intuitions fees will vary.