

In reply please quote C17: DR

8 December 2006

Mr T Bryant
A/g Director
Professional and International Recognition Unit
Australian Education International
Department of Education, Science and Training
GPO Box 9880
CANBERRA ACT 2601

Dear Mr Bryant

Re: CCEA and recommendation 31 - "Negotiating the Maze" – Joint Standing Committee on Migration.

Thank you for your letter 16 November 2006 regarding the above.

As discussed by phone, the Council on Chiropractic Education Australasia (CCEA) has been working tirelessly over the past two years to ensure that the processes and procedures it utilises with respect to the assessment of overseas trained chiropractors meets all "best practice guidelines". The CCEA has developed its processes and procedures taking into account the guidelines contained within the AEI-NOOSR "Good Practice Guide" and I will address the Principles in order below.

Principle 1 – Communication and client service

Before applying

The CCEA website (www.ccea.com.au) contains several pages which provide a brief overview of the assessment process. This overview targets those areas which it considers to be the most pertinent to candidates. At the end of the overview, candidates are advised to download the CCEA Candidate Guide, which is very comprehensive and explains in full detail, and in plain English, the requirements for application, the desktop audit process and the competency assessment process. The Candidate Guide and website also include sample questions to assist candidates in preparing for the competency assessment process.

CCEA's application forms also contain several sections advising candidates what supporting documentation has to be provided to meet that relevant section and a candidate checklist is contained at the end of the application form.

The Candidate Guide and website also advise that any queries can be directed to the CCEA by either telephone or email, however as the office is staffed on a part-time basis, both advise candidates to email any queries as this is the quicker way for response as emails can be accessed externally.

CCEA has a policy that all emails are responded to within 48 hours of receipt, which is strictly adhered to. Candidates, when emailing CCEA, receive an automated "received" acknowledgement when their email is received advising them that they will receive a response within 48 hours.

This has worked extremely well.

During process

The CCEA website and Candidate Guide both include statements advising candidates of the timeframes for assessments, e.g. desktop audit may take up to 6 weeks to process and results will be released 28 days post-assessment. As a result, CCEA receives very little communication from candidates seeking further clarification of timeframes etc.

CCEA does however receive communications from candidates seeking advice as to whether documentation, which is required to be sent by external bodies, has been received. This is an area in which CCEA has little control however once such documentation has been received, CCEA emails the relevant candidate advising them of such.

After notification of the decision

CCEA, once results are received and confirmed, advises all candidates of their results (successful or unsuccessful notification only), in the first instance, via email. CCEA also provides all Australian and New Zealand Chiropractors Registration Boards with an emailed list of successful candidates on the same day that candidates are advised. CCEA believes that this expedites the registration process for them and is very much appreciated by candidates. Such notifications have always exceeded CCEA's policy of 28 days and in some cases, candidates have been made aware of their results within 5 working days. CCEA then prepares and provides candidates with a detailed results notification, copies of which are attached. Formal documentation, e.g. suitability for migration letter and certificate are then prepared and mailed to all candidates within 28 days of emailed notification.

CCEA believes that the process outlined above provides candidates with the most accurate and fair process possible.

2. Information management

CCEA, upon receipt of an application, enters the candidate details in its application database, which is "backed up" on an external disc on a weekly basis. This data entry allocates each candidate with a unique "application reference number" which they are requested to quote in any communication. This system has worked extremely efficiently and has not presented any difficulties at present.

Each application is also given a covering checklist, upon which received documentation (or information) is marked upon its receipt. This provides an immediate visual record of the application and saves time in re-examining all documentation if a query is raised. To avoid the possibility, as much as possible, of fraudulent documentation being provided, CCEA insists that all formal documentation, such as academic transcripts and certificates of good standing are provided directly to the CCEA from the originating entity. Such documentation received directly from an applicant is not accepted.

CCEA is mindful of its obligations under the *Privacy Act 1988* and ensures confidentiality is maintained throughout all steps of the process. CCEA's website also contains a Privacy Policy and Privacy Statement.

CCEA, at this point in time, does not provide information to candidates regarding ASDOT and FEE-HELP, however will ensure that such information is provided to candidates in the future.

3. Payment for assessment services

CCEA's fees for assessment are not determined on a profit basis. As CCEA utilises the services of established and well respected chiropractic programs to administer its competency assessment, CCEA's fee schedule (stated below) is determined on a fee for service basis, including coverage of CCEA administrative costs. These fees have also been compared with "like" international organisations to ensure equity.

The fees for Desktop Audit are non-refundable and GST free and are as follows:

Stage 1 – Desktop Audit

<i>Form A1 - Application for Assessment (CCE Accredited)</i>	<i>\$300.00</i>
<i>Form A2 - Application for Assessment (Aust or NZ Qualification)</i>	<i>\$300.00</i>
<i>Form A3 - Application for Assessment (Aust or NZ Registered)</i>	<i>\$200.00</i>
<i>Form A4 - Application for Assessment of Qualifications (all other candidates)</i>	<i>\$500.00</i>

The fees for Competency Based Assessment are partially refundable and GST free and are as follows:

Stage 2 – Competency Based Assessment

<i>Part 1 Written Basic Competency</i>	<i>\$800.00</i>
<i>Part 2 Written Clinical Competency</i>	<i>\$800.00</i>
<i>Part 3 Practical Clinical Competency</i>	<i>\$1800.00</i>

As all candidates are required to undertake at least Parts 2 and 3 of the Competency Based Assessment, the minimum fee for Evaluation will be \$2600.00 (Australian) **plus** the relevant Desktop Audit Fee.

CCEA also has a refund policy which is outlined below.

As stated above, fees in relation to the Stage 1 – Desktop Audit are non-refundable, with fees in relation to the Stage 2 – Competency Based Assessment being partially refundable if notification is received prior to the dates listed below.

Fees can also be held over to a future assessment if notification is received no later than two weeks prior to a scheduled assessment.

The following partial refunds are applicable:

Stage 2 – Competency Based Assessment

<i>Part 1 Written Basic Competency</i>	<i>\$300.00</i>
<i>Part 2 Written Clinical Competency</i>	<i>\$300.00</i>
<i>Part 3 Practical Clinical Competency</i>	<i>\$800.00</i>

*CCEA **will not** provide any refund if an application is found to contain false, misleading, altered or forged statements, information or documentation.*

CCEA, at present, accepts payment of fees by personal cheque, money order or bank draft.

4. Assessment criteria

CCEA's assessment criterion is based on the following:

1. educational standards; and
2. practice competency; and
3. English language ability.

CCEA believes that the above three criterion provide the most accurate assessment of a candidate's suitability to practice in Australia.

During the desktop audit process, CCEA utilises the AEI-NOOSR Country Education Profiles to assess a candidate's educational standards as well as considering academic transcripts and referee reports.

As mentioned above, CCEA utilises a competency assessment in written and practical formats to assess a candidate's theoretical and practical skills. CCEA believes that, as chiropractic is a highly skilled manual field of health service, the only effective way to ensure a candidate's competency, skills and knowledge is to include the practical competency assessment.

The practical competency assessment is based upon accepted competencies for Australian practice. These same competencies are used by accredited chiropractic programs in Australia. CCEA does periodically provide an observer to be in attendance during assessments to ensure that its required process is administered fairly and equitably and with as little stress for candidates as possible.

CCEA also believes that regular communication with chiropractic programs in Australia allows it to continually tailor its assessments to the current Australian standards.

5. Appeals and Reviews

An appeals policy, and its process is provided to unsuccessful candidates. This policy includes the following:

- a description of the two levels of appeal;
- grounds for appeal;
- counselling procedures;
- operation of the Appeals Panel; and
- fees for appeal.

Conclusion

CCEA has gained some useful information from the content of the Joint Standing Committee's Report, e.g. candidate identification at assessment. Our processes and procedures are continually reviewed and updated. We believe that we meet the standards as contained within the AEI-NOOSR "Good Practice Guide".

CCEA, as mentioned above, is continually reviewing its documentation, processes and procedures and holds regular meetings with the Australian and N.Z chiropractic programs to ensure that assessments continue to meet required standards.

CCEA looks forward to continuing working with AEI-NOOSR and answering any further queries that you may have.

Yours sincerely

Debby Ramsay

For Phillip Donato B.AppSc (Chiropractic) FACC
Chairperson

Attachment A – Successful results notification
Attachment B – Unsuccessful results notification

Attachment A

CCEA Competency Assessment Conducted by RMIT University May 2006

Candidate: (D) (name)

Part 1 Written Basic Competency

Not required to sit.

Part 2 Written Practical Competency

2.1 Paper 1 - radiography and radiology:	82%
2.2 Paper 2 - orthopaedic and neurologic assessment and common syndrome management:	81%
2.3 Paper 3 - organ systems diagnosis and management:	67.5%

Part 3 Practical Clinical Competency

3.1 Diagnostic Radiography (positioning)	Pass, competent
3.2 Diagnostic Imaging Interpretation	Pass, competent
3.3 Chiropractic Technique	Better than entry level competence
3.4 Panel Assessment	Entry level competence

Examiner comments

Nil.

Panel Comments

The results of the clinical proficiency panel exam of Carol-Ann JENKINS follow:

History and Examination:	3 / 3
Differential Diagnosis:	3 / 3
Prognosis and Management:	3 / 3
Management Implementation:	3 / 3
Overall competence:	3 / 3

The panel considers that (name) demonstrates satisfactory knowledge and skills in this component of the examination and thus demonstrates entry level competence.

Overall comment:

We consider candidate (name) demonstrates the standard of competence that CCEA has established as being appropriate for entry into the profession of chiropractic in Australasia.

Attachment B

CCEA Competency Assessment Conducted by RMIT University May 2006

Candidate: (A) (name)

Part 1 Written Basic Competency

Not required to sit.

Part 2 Written Practical Competency

2.1 Paper 1 - radiography and radiology:	66%
2.2 Paper 2 - orthopaedic and neurologic assessment and common syndrome management:	63.5%
2.3 Paper 3 - organ systems diagnosis and management:	52.5%

Part 3 Practical Clinical Competency

3.1 Diagnostic Radiography (positioning)	Pass, competent
3.2 Diagnostic Imaging Interpretation	Pass, competent
3.3 Chiropractic Technique	Unable to demonstrate entry level competence
3.4 Panel Assessment	Entry level competence

Examiner comments

Technique: Unable to demonstrate entry level competence. Failed to apply safer techniques of adjustment of the upper cervical region. Demonstrated a high degree of poorly controlled rotation with adjustment of the cervical spine. Failed to differentiate between an ulnar border contract and a double thenar contract with adjustment of the mid thoracic spine in a prone patient when being prone is probably contraindicated in the case presented (anterior thoracic segments). Failed to demonstrate appropriate contact for prone and side posture adjustment of the thoracolumbar region. Failed to appreciate that the adjustive vectors for an externally rotated ilium should be selected to decrease the perceived external rotation.

Panel Comments

The results of the clinical proficiency panel exam of (name) follow:

History and Examination:	3 / 3
Differential Diagnosis:	3 / 3
Prognosis and Management:	3 / 3
Management Implementation:	3 / 3
Overall competence:	3 / 3

The panel considers that (name) demonstrates satisfactory knowledge and skills in this component of the examination and thus demonstrates entry level competence.

Overall comment:

It is considered that while this candidate passed the three written papers, the radiography and radiology practical and was able to integrate her skills and knowledge to a satisfactory level in the Panel Assessment, her adjustive technique demonstrates sufficient lack of specificity and control that it is not of an entry-level standard.

The University is not in a position to state this candidate meets all criteria to allow application for registration as a chiropractor in Australasia.

Should this applicant re-apply within a 12-month period from the date of this assessment we would propose she be required to demonstrate a minimum of entry-level competence with chiropractic technique and be granted credit for all other components based on the results given above. Any future assessment of technique should be before two assessors approved by the University nominated to conduct the assessment, with each assessor being appraised of this performance.

We consider candidate (name) has failed to demonstrate entry-level competency appropriate to allow application for registration as a chiropractor in Australasia.