

Dear Program Manager

The Victorian Aboriginal Community Controlled Health Organisation (VACCHO) is the peak body for Aboriginal health in Victoria. The VACCHO Education and Training Unit is a Registered Training Organisation which strives to operate as a dynamic and responsive provider of Vocational Education and Training to the Aboriginal Community Controlled Health sector.

Thank you for the opportunity to comment on the content of the draft accreditation standards and accreditation process. Please see the attached document with tracked changes and comments.

- For registered Aboriginal and/or Torres Strait Islander Health Practitioners with qualifications obtained in jurisdictions where medication administration can only be assessed in a simulated environment due to legislative requirements, what will be the implications for:
 - lawful practice in other jurisdictions?
- For registered Aboriginal and/or Torres Strait Islander Health Practitioners who practice in jurisdictions where medication administration by HPs is not allowed, what will be the implications for:
 - maintenance of clinical skills currency
 - workplace supervision and assessment of students of the qualification?
- Does there need to be specific reference to RTOs preparing students for the regulatory environment: ie students are prepared for and aware of the purpose of HP registration, the registration standards and requirements to maintain registration?
- VACCHO wishes to highlight that there will be ongoing issues with capacity to provide suitable supervision and assessment in the workplace, particularly in smaller rural and remote health services.
- Several of the criteria for standards in Field 6 are repetitive: please see comments in the attached document.
- Criteria 6.13.16: please note misuse of the term 'supply' with regard to medicines. A special endorsement (isolated and rural practice) is required for a RN to supply medicines, while all RNs are able to administer.
- Criteria 6.3.1 and 6.3.2 are ambiguous and circular ieensure the allocated funding is commensurate with the size and scope of the course, which is commensurate with the allocated funding.
- Appropriate terminology needs to be used consistently throughout the document eg 'VET Qualifications and or VET Statements of Attainment and or Testamurs/Certificates'
- Change references to units of competency 'within the training package' to 'within the qualification'

- Note comments on definition of 'clinical education and training' – there is a need to differentiate this from 'clinical placements'.

Please do not hesitate to contact us for clarification on our submission

Kind regards

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'VACCHO: The peak body for Aboriginal health in Victoria. VACCHO acknowledges that we're on Aboriginal land'