



**Notice of new recertification programme:
Child and adolescent health in osteopathy**

1 September 2017

Introduction

1. Registered osteopaths will be aware that over the past few years, the Osteopathic Council of New Zealand (the Council) has been considering and consulting on issues relating to education and current skills levels amongst the osteopathy profession in the area of child and adolescent health.
2. The Council has previously advised the profession that it would be setting a recertification programme in child and adolescent health (the recertification programme), under section 41 of the Health Practitioners Competence Assurance Act 2003 (the Act).
3. At its meeting on 7 August 2017, the Council confirmed the form and contents of the recertification programme. This document serves as a notice in accordance with section 41(6) of the Act. It sets out the particulars of the recertification programme that has been set by the Council. The table below summarises the key points all osteopaths need to know about the recertification programme. These will be covered in more detail later in the document.

Key things you need to know:

- i. All osteopaths who are registered in the General Osteopath scope of practice and hold a current practising certificate are required to complete the recertification programme by 31 December 2020, unless they apply for and are granted an exemption by the Council on the basis of **relevant** post-graduate education already undertaken or already in progress.
- ii. The recertification programme can be completed entirely online, through Ara Institute of Canterbury. Course information is included with this document.
- iii. There is a total of 100 hours of learning to be completed, divided into two separate courses. These hours can also be counted towards CPD requirements in the year in which the course is completed.
- iv. There are provisions for osteopaths who take a break from practice (and who do not hold a practising certificate during that break) within the three year period.
- v. Osteopaths who register in the future will have three years to complete the recertification programme, unless they apply for and are granted an exemption by the Council on the basis of relevant post-graduate education already undertaken or in progress.
- vi. Failure to complete the recertification programme by the due date is likely to result in public restrictions on practice.

Background

4. The Council is charged under the Health Practitioners Competence Assurance Act 2003 (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.

5. As described in previous consultations, research undertaken and presented in the [Capabilities of Paediatric Osteopaths](#) (the COPO report) in July 2015, on the capabilities of paediatric osteopaths. The COPO report identified some issues in relation to general understanding in the profession of the wider healthcare context in which child and adolescent health care is provided. The areas include:
 - (a) Critical thinking;
 - (b) Case history-taking, information retrieval, tests and screening;
 - (c) Ethics in child health care;
 - (d) Basic health programme provision in New Zealand health care;
 - (e) Child health systems and support networks;
 - (f) Mental health issues for children;
 - (g) Management of the health needs of under one-year olds across a wide spectrum of needs;
 - (h) Maori paediatric health care issues;

- (i) Adolescent health issues;
 - (j) Communication and interpersonal skills in an integrative health-care arena.
6. The Council's view is that these areas of concern are not about clinical skills in osteopathy; they relate to the knowledge of, and ability to work within, the wider healthcare context when delivering child and adolescent health care. That is; it is not the act of providing hands-on treatment to the child that is in question – rather, the process of deciding how best to assess and plan appropriate care for the child.
7. The Council has also considered the contextual issues of child and adolescent health in New Zealand today, and the Government's multi-agency approach to improving child health. The Council also took into account the requirements identified in the [Vulnerable Children's Act](#) and the recent [Children's Workforce Core Competencies – Draft Framework](#) identified by the Children's Action Group. It noted its own obligation under section 118(d) to promote the competence of osteopaths in the context of increased government action to protect at-risk children, and with reference to the important role that osteopaths have as primary health care providers to identify such children and facilitate intervention.
8. In particular, the Council referred back to the issues set out in its earlier [consultation document](#), and also considered the feedback from stakeholders, noting that:
- (a) Undergraduate training in child and adolescent health in the three main jurisdictions that supply osteopaths for practice within New Zealand (Australia, the UK and New Zealand) does not appear to provide graduates with sufficient knowledge in child and adolescent health, at both theoretical and clinical training levels.
 - (b) Current knowledge of child and adolescent care ranges significantly across the profession, as evidenced in the Capabilities of Paediatric Osteopaths (COPO) report, July 2015, in which the issues set out above were identified.
 - (c) The Council's mandatory CPD provisions are relatively new and each individual osteopath chooses their own CPD. Practitioners who have had limited exposure to children in the course of their career are unlikely to have focused on this aspect of care in their CPD choices, and, combined with insufficient core training are likely to have eroded skills in this area of practice.
 - (d) Based on [feedback on the practitioner survey](#) there was overwhelming agreement (75%) that, based on the evidence available, there is likely to be a gap in knowledge, skills and attitude to child and adolescent care amongst the general profession.
 - (e) Long-standing evidence that individual self-assessment of learning needs is not reliable. In 1997, the Goodfellow Unit in New Zealand reported on a study it had undertaken of 127 general practitioners who were asked to assess their level of knowledge in a given area. The same doctors were then tested in that area. Correlation between the self-assessments and the test scores ranged between 0.19 and 0.21 (0 = no correlation, 1 = complete correlation). Another study, reported in the JAMA in 2006, reviewed the

Goodfellow Unit's research and 12 other studies on the value of self-assessment, and reported similarly poor results.¹

9. The Council considered the question of whether competence in child and adolescent health is an essential requirement for all registered osteopaths, and after discussion formally resolved that it is an essential requirement. It formed this view on the basis that the general scope of practice specifies that practitioners work across the age span, in recognition that osteopathy is firmly based within the primary healthcare setting which should be accessible to patients in every age demographic.
10. Having regard to all of the information available to it, the Council agreed that it is not appropriate to wait for a sentinel event involving osteopathic treatment of a child or adolescent patient before it acts. It is the Council's primary function to protect public health and safety by ensuring that osteopaths are fit and competent to practise, and the evidence available to the Council at this time is more than sufficient for it to form a reasonable view that there is a risk to this patient demographic that needs to be addressed.
11. The Council is of the view that the only viable pathway to address this risk is a recertification programme covering the areas identified above. In making this decision the Council considered its statutory responsibilities under section 3 of the Act, noting that its principal purpose is that of protecting public health and safety.
12. The Council advised the profession, by letter dated 8 July 2016, and in its newsletters that it would be establishing a recertification programme in child and adolescent health, and that the next step was to identify and if necessary develop an appropriate programme. Having now undertaken this work, the Council is now formally notifying the profession of the particulars of the recertification programme that has been set.

Recertification programme: core requirements

Application

13. This recertification programme applies to all osteopaths who are registered in the General Osteopath of practice, and who hold a current practising certificate at the time that this notice is issued, unless one of the exemptions below applies.
14. It also applies to all osteopaths who register in the General Osteopath of practice and who obtain a practising certificate at any point in time after this notice is issued, until such time as the Council advises that the recertification programme is to end.

¹ 1 J Tracey et al. "The validity of general practitioners' self-assessment of knowledge: cross sectional study" *BMJ* 1997;315:1426-8 2 D Davis et al. "Accuracy of Physician Self-assessment Compared With Observed Measures of Competence" *JAMA* Vol 296 No 9, 1094-1102

Content and cost

15. The recertification programme comprises:
 - (a) Successful completion of the Ara course *Infant and young child health essentials* GCHE700; and
 - (b) Successful completion of the Ara course *Child and adolescent health essentials* GCHE701.
16. Each course contains 50 hours of learning – meaning that the total input required is 100 hours of learning. The domestic fee for course (a) above is \$293 (including GST) for 2017. This course price may change in coming years. Course (b) will become available in 2018, and has not yet been costed; however it is expected to be priced similarly to course (a).
17. Further information about course content, and details on applying to enrol, are provided in the flyer accompanying this notice.

Timeframe for completion

18. All osteopaths to whom this programme applies, and who hold a current practising certificate at the time this notice is issued are required to have completed the recertification programme requirements by 31 December 2020, unless an exemption or extension is granted by the Council, as set out below.
19. All osteopaths to whom this programme applies and who obtain a practising certificate at any time after this notice has been issued will be required to complete the recertification programme requirements within three years of the issue date of their first practising certificate, unless an exemption or extension is granted by the Council, as set out below.

Exemptions

20. Osteopaths who are currently enrolled in relevant post-graduate education may apply to the Council for exemption from the requirements of the recertification programme. At this time, the Council has determined that it will exempt any osteopath who is enrolled in AUT's Postgraduate Diploma in Child Health (AK3487), provided evidence of enrolment is supplied to the Council. The Council will consider applications for exemption from osteopaths who are enrolled in post-graduate education of comparable form, content and standard to the above course. Any application should include details of the programme of study being undertaken, and confirmation of enrolment in the programme.
21. Osteopaths who have completed relevant post-graduate education may apply for exemption from the requirements of the recertification programme. At this time, the Council has determined that it will exempt any osteopath who has completed AUT's Postgraduate Diploma in Child Health (AK3487), provided evidence of completion is supplied to the Council. The Council will consider applications for exemption from osteopaths who have completed post-

graduate education of comparable form, content and standard to the above course. Any application should include details of the qualification obtained, the programme of study undertaken, the content of the programme and confirmation of conferral of the qualification.

Extensions

22. Osteopaths who cease to hold a practising certificate for a period of time within the three year timeframe for completion of the recertification programme may apply to the Council for an extension to complete requirements. Council will consider granting an extension that equates to the period of time in which the osteopath did not hold a practising certificate, or up to three years – whichever is the lesser.
23. The Council is unlikely to grant extensions to osteopaths who choose not to practise for a period but continue to hold a practising certificate during that period.

Requirements for Competent Authority Pathway Programme (CAPP) programme participants

24. For the avoidance of any doubt, the requirements of this recertification programme are additional to the requirements of the CAPP for new overseas-trained registrants. The same timeframes for completion of both the CAPP and the recertification programme apply. That is; the CAPP must be completed within 12 months and the recertification programme within three years of registration.

Registrants under Trans-Tasman Mutual Recognition Act

25. Osteopaths who register in the General Osteopath scope of practice via the provisions of the Trans-Tasman Mutual Recognition Act, and who obtain an annual practising certificate after the commencement of the recertification programme, will have three years from the date their first practising certificate is issued to complete the requirements of the recertification programme, unless any of the exemptions or extensions noted above are granted by the Council.

Current students of osteopathy

26. UNITEC currently provides the only New Zealand based prescribed qualification for registration in the general scope of osteopathy practice. UNITEC will be updating its undergraduate course content in the coming years to include training in the areas covered by this recertification programme. Until such time as that content is updated and incorporated into the undergraduate programme, the recertification programme will apply to graduates of the UNITEC qualification, upon registration and issuing of a practising certificate.
27. Students are welcome to commence the recertification programme prior to graduation if they wish to. This is a decision for each student to make individually and is not a requirement. New registrants will have three years from the date they receive their first annual practising certificate to complete the recertification programme.

Consequences of unsatisfactory results of the recertification programme

28. Section 43 of the Act provides that if an osteopath who is required to complete the requirements of a recertification programme does not satisfy the requirements, the Council may make either of the following orders:
- (a) That the osteopath's scope of practice be altered by –
 - (i) changing any health services that he or she is permitted to perform; or
 - (ii) including any condition or conditions that the authority considers appropriate.
29. Any orders made under section 43 of the Act would remain in effect until the osteopath has satisfied all the requirements of the recertification programme.
30. If, at the end of the allowed timeframe for completion, an individual osteopath has not satisfactorily met the requirements of the recertification programme, the Council will consider whether to propose to make orders under section 43 of the Act. Each case will be considered on an individual basis; subject to such an assessment, the Council is currently of the view that it may consider proposing the inclusion of a condition in the osteopath's scope of practice stating *"Has not satisfactorily completed a profession-wide education requirement in child and adolescent health and may not treat individuals under 18 years old until this education is completed and Council has removed this restriction on practice."*
31. If the Council decides to make a section 43 proposal to an individual osteopath, it must give that osteopath a notice stating why it is proposing to make the order, and provide a reasonable opportunity for the osteopath to make submissions and be heard on the matter, before the Council makes a final decision on whether to implement the proposed order.

Further information

32. If you have any questions about the requirements set out in the recertification programme, please contact the Council on 04 474 0747