



## Consultation Outcomes: Continuing Professional Development (CPD) Policy (Recertification) and Guidance Documents

In May 2023, the Chinese Medicine Council of New Zealand (The Council) published a consultation document proposing *Draft Safe Practice Standard, Draft Policy of Recertification, Draft Recertification Guidance, Draft Policy of Recency of Practice and Draft Statement on the Use of Titles*.

This report provides a summary of the key themes of the consultation feedback for the **Policy on Recertification and the Recertification Guidance for Chinese Medicine Practitioners**, feedback responses, Proposed Changes, and the Council's final decision.

The Council extends its thanks and appreciation to the individuals and groups who provided feedback.

### Consultation Overview

Consultation respondents were asked to provide their feedback via email. The following questions were suggested to guide responses, but all responses were considered.

1. Is the standard or policy clear and easy to understand? Yes/No  
Please explain your reasons or suggest changes or alternate wording.
2. Is there anything missing from the standard or policy? Yes/No  
Please explain your reasons or suggest changes or alternate wording.
3. Do these documents fulfil their purpose of public protection? Yes/No  
If not, why not? Please explain your reasons.
4. In terms of the draft Standards, are they usable in everyday practice? Yes/No  
Please explain your reasons or suggest changes or alternate wording.
5. Do you have any further comments specifically relating to these documents?

Included in this summary document are individual submissions received from:

- Acupuncture New Zealand

- Chinese Medicine Board of Australia
- The Register of New Zealand Traditional Chinese Medicine Practitioners Inc

And a joint industry submission from:

- Allied Chinese Medicine Aotearoa New Zealand
- New Zealand Acupuncture Standards Authority
- New Zealand Chinese Medicine and Acupuncture Society
- New Zealand College of Chinese Medicine
- New Zealand School of Acupuncture and Traditional Chinese Medicine

## Consultation Feedback Themes, comments, and suggested amendments

Theme	Sample Submission Comments	Suggested Amendments or Feedback
General feedback	<p>We agree with increasing the Continuing Professional development (CPD) hours from the current standard of 20 hours to 22 hours. We are also in agreement with the 2hrs of mandatory Cultural Competency safety and Cultural competence CPD annually.</p> <p>The draft Policy is clear and easy to understand, fulfills the purpose of public protection and is suitable for everyday practice.</p>	None required
Suggested addition of a Professional development plan as a requirement.	<p>We recommend that the Council considers providing a PDP template and that the CM practitioner should keep this alongside their record of CPD activities and CPD evidence. A declaration relating to the completion of the PDP would form part of the annual APC application process and this would then be requested when an audit is undertaken alongside the other documentation already outlined in the policy.</p> <p>We believe that in making the completion of a Professional Development Plan a mandatory requirement, it will formalize the planning process. By the Council providing a PDP template this provides a key to the implementation of well thought out and meaningful CPD activities which will enhance professional development.</p>	<p>Initial drafts of the recertification program included detailed PDP processes. However, Council feedback noted that the CMC did not wish to unduly pressure new registrants with changes that did not necessarily reflect a direct impact on the risk to public safety.</p> <p>The Council moved that for CPD to be meaningful, it is required that a self-assessment against the competencies guide the selection of appropriate CPD activities, and the reflective practice form a basis of ongoing planning and self-monitoring.</p> <p>This is reflected in the current CPD guidance for practitioners and will be assessed during audit cycles.</p> <p>Whilst the PDP has not be considered a mandatory component the following statement has been added to the guidance document;</p> <p>You may also wish to consider a professional development plan for your CPD. This can be revisited and refreshed during the year as you progress through</p>

		<p>your plan and can form a useful component of self-reflection.</p> <p>Some examples of PDPs can be found at here;</p> <ul style="list-style-type: none"> <li>• <a href="http://rnzcgp.org.nz/PDP_template_2016.pdf">PDP template 2016.pdf (rnzcgp.org.nz)</a></li> <li>• <a href="https://www.osteopathiccouncil.org.nz/Public/Public/Registered-Osteopaths/Professional-Development.aspx?hkey=6911b317-341e-4c81-9888-99d87b404694">https://www.osteopathiccouncil.org.nz/Public/Public/Registered-Osteopaths/Professional-Development.aspx?hkey=6911b317-341e-4c81-9888-99d87b404694</a></li> </ul>
<p>Clarity on wording</p>	<p>We are unsure what is meant by the following wording from the first paragraph of page two. Failure to satisfy the Programme requirements may result in the Council altering a practitioner’s health services... We recommend that it is made clear what this means.</p> <p>We suggest that instead of the wording <b>Any</b> completed CPD activity requires a registrant to produce a written reflection on the topic... That this is changed to <b>All</b> completed CPD activities require a registration to ...</p> <p>We recommend the table on page 1, is titled - How to complete your Recertification (CPD) requirements each year. We recommend the following wording is considered, as we believe this provides further clarity and useability of the guidance.</p> <p>The Draft Guidance does not refer to the Recertification Policy that it is providing guidance on. The Council may wish to consider referencing the Recertification Policy in the Guidance document.</p> <p>For all other CPD activities, the draft provides the detailed standard, but for <b>Research literacy</b>, the draft does not.</p>	<p>Feedback noted and suggested changes adopted.</p>

	<p>Could you describe the detail how to calculate the CPD of Research literacy?</p> <p>The Council recommends that this document be renamed CPD Policy (Recertification) due to it being more familiar terminology</p>	
Format and content order	To improve the clarity of the Policy, we recommend that the section on CPD activities and written reflection on CPD activities should be in a separate section before this one headed CPD Activity Record.	Feedback noted and suggested changes adopted.
Required evidence	<p>It is usual practice for there to be a record of attendance provided by CPD providers and peer review groups, this may come in the form of an email confirming attendance and not always with a certificate of attendance or completion.</p> <p>We believe that this should remain the requirement for CPD which is completed by attending an educational meeting, lecture/webinar, or peer support opportunity (either online or in person).</p> <p>We believe a reflective statement (without co-operating evidence) would be appropriate if a practitioner has conducted a CPD activity on their own, such as reviewing current research on a particular clinical topic.</p>	Feedback noted and suggested changes adopted.
CPD cycle	<p>It is not clear in the policy if any CPD hours can be held over to the next CPD cycle. This would apply if a practitioner had completed a longer period of study in one recertification cycle or if their course ran into a second recertification cycle.</p> <p>We recommend the Council consider this and make it clear in this policy what they will accept.</p>	Suggestion noted. At this stage the hours will not be carried over. This may be reviewed at the first audit cycle, but the CMC does not wish for a situation whereby a registrant may be in multiple year deficit whilst the new policy takes effect.

	<p>Other Boards states that practitioners do not need to meet this standard for the preceding year when applying for registration for the first time as a Chinese medicine practitioner. The Council may consider including an equivalent statement in the draft Recertification Policy or draft Guidance.</p>	<p>Due to the majority of practitioners working in isolation, it is deemed relevant to engage in peer-based activities (which may include a form of mentoring) from the first year of registration.</p>
First aid certification	<p>We request that the Council makes it clear in the documentation if the mandatory First Aid recertification training will be counted towards CPD for the purposes of the recertification policy.</p> <p>We must provide the First Aid certificate to AcNZ to get the APC, which means the First Aid training hours could be involved in CPD now. For council CPD, should we still need First Aid Certificate when we register? If yes, how many hours could be used as CPD hours?</p>	<p>Included in the Council's 'Standards of Clinical Competence for Chinese Medicine Practitioners' is the competency - Maintain currency in first aid certification relevant to safety in clinical practice.</p> <p>The full course time (CPD hours) for meeting this competency will be awarded. For example, <a href="#">the St Johns refresher course total course time is 6.5hours</a>. As first aid certification should remain current (and will be held during as a student clinician) it is estimated that all registrants will spend 6.5hours every two years on first aid CPD.</p>
Self-directed learning	<p>We recommend that it is made clear if self-directed learning such as reading of professional journals of both Chinese Medicine and Western medicine research will count towards CPD hours (with the requirements of a reflective statement etc). Or whether this would require a more structured setting such as a journal club, or during preparation for a professional presentation to colleagues.</p>	<p>The following section has been added for clarity; Self-directed leaning can play a role in your CPD and can be used for points if the following details are retained for recording and audit purposes;</p> <ul style="list-style-type: none"> <li>• The identified learning need – based on an evaluation of your practice against the relevant competency or professional practice standards</li> <li>• A learning plan – based on identified learning needs</li> <li>• Your participation in the learning activity – relevant to learning needs</li> <li>• The outcome achieved and reflection on the value or effect that participation in the learning activity will have on professional practice.</li> </ul>

		<ul style="list-style-type: none"> <li>References to the articles or other sources that you have read are needed for self-directed activities.</li> </ul>
Insufficient hours	We anticipate, that with time the number of CPD hours required will increase in line with other New Zealand Health care professionals.	Suggestion noted. The number of hours will be reviewed at the first review cycle. Notifications about public safety will form part of this review. As the Council's primary role is to ensure public safety, policies and standards will be changed based on a combination of stakeholder feedback and audits of notifications.
More content needed, or suggestions for improvement	There could be greater detail on exemptions from CPD, such as planned leave and parental leave. The Council may wish to consider including further information in an FAQ.	It is anticipated that further details will be added to the website and information for registrants and CPD will be included.

## Council decisions

The Council met to discuss the consultation outcomes and suggested amendments on the 1<sup>st</sup> August 2023. All suggested amendments were accepted. The Council resolved to approve the **Policy on CPD (Recertification) and the CPD (Recertification) Guidance for Chinese Medicine Practitioners**, subject to the modifications as proposed.

The Council advises it to introduce the Publication of **Policy on CPD (Recertification) and the CPD (Recertification) Guidance for Chinese Medicine Practitioners** effective August 2023. The final document can be found on the Council's website under Publications & Forms.