

31 October 2019

Daniel Bond
ANZSRC Review Steering Committee
Australian Research Council
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Dear Mr Bond

Thank you for your correspondence of 15 October, 2019 seeking feedback on the Draft Australian and New Zealand Standard Research Classification code. The Australian Council of Deans of Health Sciences (ACDHS) is very grateful for the opportunity to provide comment. Indeed, we commend the Steering Committee for their work and are delighted to see our feedback to the Discussion Paper reflected in the Draft Classification document. It acknowledges the significant advancement of allied health and rehabilitation science and its contribution as drivers of better healthcare. ACDHS is particularly pleased with the proposal to split FoR 11 into two, with Council members overwhelmingly supporting the new FoR 24: Public and Allied Health Sciences.

This response takes into consideration the detailed feedback from Council members. We understand that as a further consultation on the Draft is proposed, Council has deferred the inclusion of detailed feedback to such time and expects that individual universities will make submissions. (Council of course, would be pleased to share feedback with you sooner should you request it). Therefore, this response addresses at a *high* level and in broad terms the Council's feedback primarily to the 2 and 4 digit FoRs.

Our high level feedback is that Council:

- is very supportive of the intention to form a new 4-digit code (2401) for Allied Health and Rehabilitation Science
- recommends that Gastroenterology and Hepatology, Pathology, and Radiology and Organ Imaging are not included in this new field, and instead remain in FoR 11: Biomedical and Clinical Science
- supports the new Health Services and Systems code, and the 6-digit codes it includes. We also recommend that Digital Health be included within this 4-digit code.
- does not support the proposed new Musculoskeletal Health code. Orthopaedics and Rheumatology codes already exist in FoR 11, and muscle and bone physiology are found in the Human Physiology codes.
- does not support the establishment of a separate 4-digit code for Midwifery given the very small quantum of papers and activity in this code compared to other 4-digit codes in health. We suggest, instead, renaming this 4-digit code Nursing and Midwifery rather than just Nursing, and include Midwifery at 6-digit level under this code.

- recommends Nutritional Epidemiology be classified under Epidemiology (2402) rather than Nutrition and Dietetics (2407)
- notes that Diagnostic Radiography is not listed, and recommends that Diagnostic Radiography be included with Nuclear Medicine in FoR code 2401
- considers the proposed new FOR 110907 'Cognitive Neuroscience' unnecessary given that it would logically be included in the existing 4-digit code for Cognitive Science (1702); and,
- similarly, 240113 (Therapy, excl physiotherapy) seems unnecessary given the existence of 240199 (Allied Health and Rehabilitation Science note elsewhere defined).

In addition, we have some more minor suggestions to alert you to what we believe to be drafting errors in the current version. Specifically:

- FoR 1114-111499 should be reworded to 'Reproductive Medicine not elsewhere defined' since Paediatrics has been moved to 1120 which includes 'Paediatrics not elsewhere defined'.
- In the 1106 section it is suggested that 110604 (Sports Medicine) be moved to 2401 (Allied Health and Rehabilitation Science). However, there is no proposed six-digit code for Sports Medicine in 2401. Rather, the new six-digit code for Sports Medicine is 110329, within 1103 (Clinical Sciences). This analysis has assumed that Sports Medicine will move to 1103 and not 2401.
- 111708 (Health and Community Services) has been mistakenly reassigned to both 240303 (Health and Community Services) and 241003 (Health and Community Services). In this analysis outputs related to 111708 (Health and Community Services) have been assigned to 2403 only.
- It is suggested that 2403012 (Palliative Care) was formerly part of 1117, but there was no pre-existing Palliative Care code in the FoR code schema.
- 'Public Health not elsewhere classified' has been assigned to 241009 when it should be 241099.

Thank you once again for the opportunity to provide comment.

Please do not hesitate to contact the ACDHS Directorate on (08) 8302 1187 or via email acdhs@unisa.edu.au if you have any further queries.

Yours sincerely



Professor Esther May
Chair



Jen Coulls
Executive Officer