

FORUM OF AUSTRALIAN HEALTH PROFESSIONS COUNCILS

Response of the Forum of Australian Health Professions Councils to National Registration and Accreditation Scheme Consultation Paper on Proposed arrangements for accreditation

Preamble

The Forum of Australian Health Professions Councils (FAHPC) is a coalition of the ten Councils concerned with accreditation in each of the regulated health professions. It comprises the:

- Australian Dental Council
- Australian Medical Council
- Australian Nursing and Midwifery Council
- Australian Osteopathic Council
- Australian Pharmacy Council
- Australian Physiotherapy Council
- Australian Psychology Accreditation Council
- Australasian Podiatry Council
- Council on Chiropractic Education Australasia
- Optometry Council of Australia and New Zealand

The Forum welcomes the opportunity to comment on the proposed national arrangements for accreditation of health professional education and training under the National Registration and Accreditation Scheme (NRAS). In doing so it acknowledges the opportunities the Forum has had to engage constructively with members of the National Registration and Accreditation Scheme Implementation Team both before the consultation paper was released and during the consultation period.

The accreditation body in accrediting a professional education and training program and provider is undertaking a process that ensures that a university or training body has in place the academic and clinical educators, the education and training facilities, and the processes and resources required to demonstrate quality in graduate outcomes, and teaching and learning outcomes. The focus of accreditation is on quality systems and outcomes, and the inputs, processes, content and outputs related to fundamental aspects of the teaching and learning environment, the operating environment and the education and training program.

This submission, which constitutes a consensus response of the Forum, is confined to the general issues below that are common to all the health professions. Each of the organisations will be making separate submissions on issues more germane to themselves.

Accreditation standards framework

The Forum welcomes the intention that the Agency will utilise the *Standards for Professional Accreditation Processes* (June 2008) developed by Professions Australia and endorsed by the Forum as these are in accord with best practice in the health and other professions and with international standards such as the *World Health Organisation/World Federation of Medical Education Guidelines for Accreditation of Basic Medical Education*. These include the critical

stipulations that accreditation should operate within a legal framework and should be independent of government and other stakeholders (1.6 and 3.1).

It should be noted that with regard to Proposal 3.10.1 (a) (page 18) the proposal part (a) currently reads "*the document Standards for Professional Accreditation Processes developed by 'Professions Australia' in consultation with the Forum of Health Professions Councils*". The document was indeed developed by Professions Australia (prepared by Theanne Walters of the Australian Medical Council and members of the Professions Australia Accreditation Forum). The Forum of Australian Health Professions Council endorsed the document as outlining the principles of accreditation processes, therefore Proposal 3.10.1 (a) should read "*the document Standards for Professional Accreditation Processes developed by 'Professions Australia' **and endorsed by** the Forum of **Australian** Health Professions Councils*".

Terminology

The Forum draws attention to the potential confusion arising from the use of the term 'standards'. It is used to refer to 'accreditation standards' and also to refer both to governance *and* operational standards set by the National Agency (as set out in the IGA clauses 1.34 and 1.35) and profession-specific educational and training standards (as defined in Bill A s9(2)) that are the province of the National Boards and their accreditation bodies. Proposal 3.5.4 is an example of such ambiguity and the potential for confusion.

Accreditation panels

The current accreditation bodies consider that the composition of an accreditation panel must remain very flexible and able to be tailored for the circumstances. Each program to be accredited can require unique skills and experience from a panel, and lacking such knowledge can jeopardise the integrity of the accreditation process.

The members of the Forum suggest that the selection of members for accreditation panels be less defined, and be the responsibility of the accreditation body. The Professions Australia *Standards for Professional Accreditation Processes* (June 2008) outlines the responsibility of the accreditation body in having '*policies on the selection, appointment, training and performance review of team members*'.... providing '*... for the use of competent and knowledgeable individuals, who are qualified by experience and training, to assess professional education and training programs.*' (page 5)

The assurance of transparency, independence and accountability by way of wide representation from within and outside the profession in relation to accreditation will come in the several layers within the accreditation body through which accreditation recommendations of the assessment panels are made.

Aims of accreditation

The Forum seeks the inclusion of a statement to the effect that the aims of accreditation include both quality assurance and quality improvement. To achieve this dual purpose it should be explicitly recognised that accreditation is a collegial process based on self- and peer-assessment. Thus the processes of accreditation should provide both public accountability for the quality of training and should also encourage further improvement in the quality of training.

This dual function of accreditation is explicitly recognised in the dual standards for quality assurance and quality improvement set by WHO / WFME for medical education and training and in the section *Aims of the accreditation process* (page 3) of Professions Australia's *Standards for Professional Accreditation Processes* (June 2008).

Section 3.1, page 9, 2nd paragraph of the Consultation Paper states that '*The purpose of accreditation of education and training courses is to ensure that graduates have the required*

skills, knowledge and competence to practice safely and meet registration requirements.' This statement should also incorporate the phrase "relevant professional attitudes and behaviours" (in addition to skills, knowledge and competence).

Functions of existing accreditation bodies

A clearer distinction needs to be made between program accreditation and assessment of individual qualifications (usually overseas). These are dual functions of many existing accreditation bodies but they are distinct processes that are undertaken through separate committees.

To avoid confusion between the two terms it is recommended that the term *accreditation* in this context should refer only to program accreditation, thus 3.6 (pages 16 and 17) relating to the establishment of new accreditation committees implicitly deals only with program accreditation and different processes are necessary for *assessment* of individual qualifications.

Similar comments apply to 3.10 (pages 18 and 19).

Respective powers of ministerial council, national boards and accreditation bodies.

It is understood that it is the intention of the Ministers to assign existing national accreditation bodies to continue with this function, and that the accreditation body will provide the accreditation standards to the National Board for approval and recommendation to the Ministerial Council. This requires explicit clarification as s9 (2) of Bill A states only that the functions of an accreditation body 'may' include developing the standards for accreditation.

Additionally, there exists concern regarding the possibly opposing interests of the accreditation bodies and the National Board and Ministerial Council. The accreditation bodies have previously set accreditation and assessment standards through extensive stakeholder consultation. Standards are based on the maintenance and improvement of education and training. By contrast, the interests of the National Board and Ministerial Council are likely to be workforce pressures and funding issues, potentially prompting a compromise in education and training standards and public safety.

Funding

Due to the nature of the tasks involved, the frequent emergence of unforeseen new programs and the collegial model of continual improvement, the expenditure related to accreditation is inconsistent and unpredictable on an annual basis. Funding from the NRAS to accreditation bodies should continue to be based on the current capitation model to ensure the accreditation body is able to cover infrastructure and operating costs associated with the accreditation role.

Governance

The Forum reinforces the need for the bodies undertaking the accreditation and assessment process to be accountable for the use of funds and transparency of processes and decision making. Nevertheless it is concerned that the Councils not be subject to micro management and onerous reporting requirements which would mitigate against their effective functioning.

Contacts

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