

SUBMISSION ACT MEDICAL BOARD

on the

CONSULTATION PAPER

Proposed arrangements for accreditation

Proposal 3.4.1: It is proposed that in preparation for commencement of the national scheme, national boards will consider whether there is a need for specialist endorsements in their profession.

Board Submission

The board strongly supports the proposal of specialist endorsements. The board suggests that the names of those practitioners who hold endorsed specialist registration be placed on a separate part of the register (as is the present case in the ACT) which would ensure that members of the public have ready access to the lists of such endorsed specialists.

Proposal 3.4.2: In the case of the medical profession, it is proposed that the national board take advice from the Australian Medical Council on the list of specialties and associated specialist qualifications, against which the board could endorse individual registrants as specialists.

Board Submission

Whilst the board supports this as an initial stance, it would recommend that consideration be given in the longer term for a national accreditation agency be established in the longer term to undertake such an advisory role. The expertise developed by the AMC could be used for this purpose, which could in turn be used to assist in rolling out similar programs for the other health professions.

Proposal 3.4.4: It is proposed that the Ministerial Council specify that the core accreditation functions initially assigned to the external accreditation bodies are the core functions listed above where those functions are currently undertaken by the body.

Board Submission

The board whilst supporting the tenor of this proposal is interested in what is viewed as core functions. The board does not believe that some current functions undertaken by the AMC could be viewed as core functions. The board particularly refers to the service currently provided to the medical boards by the AMC of acting as a conduit for the verification of qualifications held by international medical graduates (IMG). The board would advocate that this service which has been implemented by the AMC through the International Credentials Service of the US based Educational Commission for Foreign Medical Graduates service should be assumed by the national agency as it more rightly is a registration not accreditation function. In so doing, there is a potential to reduce costs to IMG of gaining registration in Australia.

Proposal 3.5.4: It is proposed that the national scheme legislation provide that the agency must consult with the boards on the development of the standards to govern registration and accreditation processes within the scheme.

Board Submission

The board agrees with this proposal but would prefer that the national boards have a greater responsibility for the processes in an attempt to reduce red tape often inadvertently included in such processes as a result of ownership of the processes by the bureaucracy. This is not intended as a criticism but simply as a reflection of possible outcomes of loss of ownership of the processes by the boards.

Proposal 3.5.6: As per Bill A, it is proposed that the national scheme legislation provide that the accreditation bodies and committees of the national board be required to consult widely when developing standards for accreditation.

Board Submission

Whilst agreeing in principle with this proposal, the board suggests that a definition of “more widely” would be appropriate.

3.4 Accreditation committees

Where accreditation is not assigned to an existing national accreditation body, it is expected that the national board will establish a committee to undertake this function. Given that the Ministerial Council is likely to take decisions at the end of 2008 on initial assignment of external accreditation roles, the relevant boards should establish accreditation committees soon after their establishment in 2009. This will enable the committees to develop accreditation standards and set up processes prior to July 2010, being the commencement date for the national scheme.

Clause 1.26 of the IGA lays down the process for appointments to committees. It states that in relation to any committees established by a board to carry out its functions:

- (a) *committee members will be drawn from a process approved by the Ministerial Council;*
- (b) *committee members will be provided with appropriate statutory immunities relevant to the function;*
and
- (c) *the legislation will specify the minimum number of committee members and their composition that is required for statutory decision-making.*

Composition of accreditation committees

Further, the IGA sets specific provisions for the establishment of accreditation committees in Clause 1.38 which require the national board to undertake consultation with the profession, education and training providers, consumers and governments, before determining the composition of an appropriate accreditation committee. Clause 1.39 requires the committee to comprise registered practitioners, persons with education and training expertise, persons who are not members of the relevant profession, and at least two persons who are also members of the respective board.

The appointment of members to the accreditation committee is the responsibility of the national board. The appointment process is to proceed in accordance with a process agreed by the Ministerial Council.

The number of members on accreditation committees should be set at a level to ensure there is appropriate expertise but the committee remains an efficient size. A committee of eight would allow for two members from each fore-mentioned category.

Proposal 3.6.1: It is proposed that the Ministerial Council require that accreditation committees comprise two registered practitioners from the relevant profession, two members with education and training expertise, two community members and two representatives from the relevant national board.

Board Submission

Whilst generally agreeing in principle with this proposal, the board does not understand the rationale behind its construct. No explanation is provided in the consultation paper as to why the particular membership set was chosen. The board would prefer that a less well defined membership be identified with individual boards having responsibility for deciding membership within an agreed general framework.

Proposal 3.6.4: It is proposed that the legislation will give general delegation powers to boards allowing them to delegate other functions to agency staff and committees, as well as external accreditation bodies, where they consider this is the best way to achieve the objects of the national scheme and it is consistent with their powers under the legislation.

Board Submission

The board does not agree to the delegation of such support functions to state offices as this has the

potential to reduce expertise with consequential effects on the quality of outcome. The board would prefer that a division of the national agency be established to provide this support role to all accreditation activities.

Proposal 3.7.1: It is proposed that any organisation disadvantaged by an accreditation decision of the board should have the right to seek a merit or process review and, if required, go beyond that to an external process of review.

Board Submission

The board agrees with this proposal but is unsure as to what external processes of review are available.

Proposal 3.10.2: It is proposed that the legislation provides for ongoing monitoring of education courses and institutions, including requiring accredited education providers to report to the accreditation body or committee any significant curricular changes or resourcing issues that would adversely impact on students and compromise their ability to register, and requirements for the accreditation body or committee to report any such adverse events to the relevant national board as soon as it becomes aware of them.

Board Submission

The board agrees with this proposal but retains the view that this is as simple as suggested by the proposal. Whilst restrictions could be put on future intakes of students, the problem of current students in a non compliant or troublesome course or institution needs to be addressed. A course failing to meet accreditation standards must affect the ability of a graduate to gain registration. How could such a situation be handled under this proposal?

Proposal 5.1: It is proposed that the national scheme legislation provide that standards for accreditation are developed in consultation with New Zealand and any other country with which Australia has (or develops) a mutual recognition agreement.

Board Submission

The board agrees with this proposal. Similar consideration might be given to those countries recognised as a competent authority by the AMC. The AMC would be able to provide further information on this process.