Australian Psychology Accreditation Council

SUBMISSION TO THE NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR THE HEALTH PROFESSIONS

CONSULTATION PAPER

On Proposed Arrangements For Accreditation

(HEALTH WORKFORCE PRINCIPAL COMMITTEE)

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GENERAL COMMENT

The Australian Psychology Accreditation Council (APAC) welcomes the opportunity to comment on the proposed national arrangements for accreditation of health professional education and training. APAC is supportive of the general premises of the paper and welcomes in particular its enunciation of principles for national accreditation that are in accord with best practice in other professions and with international standards. These principles include the important stipulations that accreditation should operate within a legal framework and should be independent of government and other stakeholders.

APAC encourages the inclusion in any future preamble of a statement to the effect that the aims of accreditation include both quality assurance and quality improvement. Best practice in accreditation is a collegial process based on self as well as peer assessment and provides not only public accountability and safety but also the stimulus to further improve quality of training. It is most important that this aspect of accreditation is not lost in the national scheme.

RESPONSES TO SPECIFIC PROPOSALS

3.4 SCOPE OF 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.

APAC supports Proposal 3.4.1.

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.

APAC seeks a similar role as it is able to give advice based on the availability of appropriate accredited training programs for specialties adopted by the National Board.

Proposal 3.4.3: It is proposed that in line with the IGA the national scheme legislation will provide that while boards may approve the initial list of specialties, any new specialties or specialty areas of practice will require Ministerial Council approval.

APAC supports Proposal 3.4.3.

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.

APAC wishes to point out that the accompanying explanatory statement that *"psychology internship programs are currently accredited by boards"* is incorrect as about half the interns (those in the non university pathway) undertake programs that are not currently accredited by boards. The other half (who undertake internships as part of university courses) have their internship programs accredited by APAC as part of those postgraduate courses. APAC suggests that this anomaly be corrected by assigning it the responsibility to accredit all internship programs. The core functions listed are acceptable to APAC.

Proposal 3.4.5: It is proposed that the Ministerial Council specify that it would be open to boards to delegate to external accreditation bodies or committees other functions related to accreditation or other matters for which the boards have responsibility, but the boards would not be required to do so.

APAC supports Proposal 3.4.5.

Proposal 3.4.6: It is proposed that the national scheme legislation allows for changes and expansion of the range of courses accredited with any such expansion requiring the approval of the relevant standards by the Ministerial Council.

APAC believes that the Ministerial Council could endorse changes but should not have final approval of standards, to protect the standards and quality of training and education from potential government interference. The national scheme legislation should not surrender the independence of APAC and the National Board in setting standards for the profession because otherwise there is a risk that government, motivated by workforce and other considerations, will block the development of new standards, preventing psychologist training and education from keeping pace with international developments.

Proposal 3.4.7: It is proposed that the legislation provide general powers of delegation to boards allowing them to delegate other functions to external accreditation bodies where they consider this is the best way to achieve the objectives of the national scheme and where this is consistent with their powers under the legislation.

APAC supports Proposal 3.4.7.

3.5 GOVERNANCE ARRANGEMENTS FOR EXTERNAL ACCREDITATION BODIES

Stakeholders are invited to provide comment on how the guidance to be provided on the governing body of external accrediting bodies can provide for community input and input from education providers and professions but provide independence in decision-making.

APAC has policies and procedures in place for input from the peak bodies of education providers, community bodies and the profession. APAC considers that the independence of accreditation bodies is best served by members being appointed on the nomination of constituencies rather than as representatives of those constituencies. This will permit members to act in the best interests of the accreditation body without the representatives having to refer back to their constituencies on policy matters.

Proposal 3.5.1: It is proposed that the agency's requirements in relation to the national scheme should be specified in the contract with the specific accreditation body.

APAC cannot agree to this Proposal without clarification of what is meant by "the agency's requirements". The National Agency should be involved in providing guidance and assistance on administrative matters only and should not be able to interfere in matters of setting of standards or the conduct of accreditation assessments. These are matters for the contract between the National Board and APAC only.

Proposal 3.5.2: It is proposed that the terms of contracts between the agency and the external accrediting body include but are not limited to, the following matters:

(a) The objectives of the national scheme

(b) The accreditation framework standards developed by the agency

(c) The budget for the accreditation functions it is performing for the national board

(d) The contribution to the cost of those functions to be drawn from registration fees

(e) Monitoring and reporting arrangements

(f) Requirements relating to contributions to the national board's annual report, and

(g) Provisions relating to termination of the contract.

It is uncertain what the Paper is referring to in 3.5.2 (b) by the phrase "accreditation framework standards developed by the agency". The Agency must have no role in the development of accreditation standards or the core functions of accreditation. This requires clarification before APAC could agree to any such arrangement.

Proposal 3.5.3: It is proposed that the arrangements between the agency and any external accreditation body form part of the health profession agreement between the agency and each national board, providing both the national board and the agency with input to the arrangements.

APAC supports Proposal 3.5.3.

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.

APAC is very concerned that Proposal 3.5.4 suggests the National Agency might have some powers in relation to accreditation functions. The National Board should hold the responsibility for accreditation and contract expert accreditation services from APAC. The Agency's role must be limited to administrative support of the National Board and must not have any role in relation to the setting of standards or accreditation activities. When the national scheme legislation is drafted it is important to avoid any confusion between what is meant by 'standards' and 'processes' and it must be clear what are administrative functions and what are professional functions so that the Agency and Board correctly recognize their respective jurisdiction over such matters.

Proposal 3.5.5: It is proposed that the external body assigned to undertake accreditation in the first three years will have the ability to delegate parts of the accreditation function to other agencies, while it remains responsible for the overall function, where there is no conflict of interest and where this was the arrangement at the time the accreditation function was assigned.

APAC supports Proposal 3.5.5.

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.

APAC supports Proposal 3.5.6 and already has policies and procedures in place to ensure wide consultation on the development and implementation of standards.

Proposal 3.5.7: It is proposed that the national scheme legislation provide that the agency be required to publish on its website, the standards for accreditation following approval by the Ministerial Council as well as all fees and charges related to accreditation.

APAC agrees in principle with the notion of ensuring that information about accreditation fees and charges are publicly available and already publishes its fee structure on its website and in its accreditation documents. APAC would not agree however to allowing the Agency or any other body to be responsible for the collection of, or advice about, accreditation fees. APAC would also not agree to making the Agency or any other body responsible for the publication of information regarding its accreditation standards and associated assessment procedures. These could be presented via a link from the Agency's website to APAC's site, but the publication of such material must be the direct responsibility of APAC.

Proposal 3.5.8: It is proposed that the contract with the external accreditation body require that body to provide information to the national board on financial reports pertaining to accreditation functions, activities undertaken during the year, including standards developed, courses accredited or monitored, the number of qualifications assessments of overseas trained practitioners undertaken and the decisions made as a result of these assessments, and anything else requested by the national board, for inclusion in the agency's annual report.

While APAC is supportive of the notion that it report aggregate data regarding its activities to the Agency on an annual basis, APAC could not agree to report *"...anything else requested by the national board, for inclusion in the agency's annual report"*. This would lay APAC open to the risk of unreasonable reporting requirements or requirements which would breach the confidentiality of its assessment and reporting processes. Confidential matters, some of which contain commercial-in-confidence material, are contained in assessment reports and if published in detail would erode the trust APAC has developed between itself and the institutions it accredits. The national scheme legislation should be clear about the limitations on reporting and these requirements need to be sensitive to issues of confidentiality, cost and workload.

3.6 ACCREDITATION COMMITTEES

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.

It is not apparent whether Proposal 3.6.1 applies only in the case of the establishment of a new accreditation committee. If this Proposal does in fact only apply to committees, rather than external accrediting bodies, APAC is supportive Proposal 3.6.1.

Proposal 3.6.2: It is further proposed that the Ministerial Council require that the relevant national board appoint an accreditation committee chair from among these members.

APAC believes that the appointment of any such chair should require the chair to be a member of the profession.

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.

APAC is supportive of Proposal 3.6.4.

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.

APAC agrees with including the provision of access to a process review. Accreditation bodies must be allowed to function independently and make peer review judgements on the status of training institutions, but should also to be able to correct these when errors of fact have occurred. Allowing appeals based on 'merit' are not supported. APAC's view is that such appeals are likely to be vexatious, expensive and will undermine the objectivity and authority of accreditation. Should appeals be necessary, then APAC suggests that a senior committee comprising seven Chairs of the Forum of Australian Health Professions Councils be formed to hear appeals but that legal representation not be allowed.

Proposal 3.10.1: It is proposed that the Ministerial Council request that the agency consider the following matters in developing standards for accreditation processes:

(a) the document *Standards for Professional Accreditation Processes* developed by 'Professions Australia' in consultation with the Forum of Health Professions Councils

(b) the need to meet any relevant international guidelines relating to the specific professions

(c) the need to align standards with relevant international standards and clearly indicate the international standards on which these standards are based when presenting them to boards for consideration, and

(d) the need to ensure that accreditation assessment panels provide sufficient public accountability and independence.

Some of the concerns expressed in the response to 3.5.4 above are also relevant here. APAC is in agreement with the spirit of the proposals in 3.10.1, but requires that the National Board, not the Agency, should be responsible for such matters.

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.

APAC supports Proposal 3.10.2.

4 LINKAGES WITH COMMONWEALTH, STATE AND TERRITORY GOVERNMENT

Proposal 4.1: It is proposed that accreditation reports will be made publicly available in the agency's annual report and on its website. These reports will include recommendations and outcomes of accreditation processes and information on education and training courses.

APAC's response to 3.5.8 has already expressed concern at any requirement to publish full reports on particular accreditation assessments. If the intention of this proposal is to require the publication of summary information rather than full accreditation assessment reports, then APAC is supportive. APAC does not support any requirement for it to publish in the way suggested here its assessment reports, which can contain commercial-in-confidence material, frank disclosures of

problems and weaknesses and other matters which, if publicly available, would erode the trust between APAC and the institutions it assesses.

5 INTERNATIONAL LINKAGES

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.

APAC is supportive of this Proposal.

6 TRANSITIONAL ARRANGEMENTS

Proposal 6.1: It is proposed that transitional arrangements to be included in the national scheme legislation will include requirements for:

a) current boards to provide the new national boards with their lists of accredited courses prior to the commencement of the national scheme

b) standards for courses or education providers which exist on 30 June 2010, to continue until they are replaced with standards developed under the national scheme and approved by the Ministerial Council

c) education and training courses and education providers which are accredited by the current boards on 30 June 2010 to be deemed to be accredited under the national scheme until they have been re-accredited under the new provisions, and

d) lead times of at least one full year for the introduction of any new accreditation standards following approval by the Ministerial Council to allow course providers to make any required changes to their courses.

APAC is supportive of the Proposals set out in 6.1.