

## **National Registration and Accreditation Scheme for the Health Professions**

### **Comments on proposed arrangements for accreditation**

**December, 2008**

Medical Deans Australia and New Zealand Inc (Medical Deans) is the peak body representing medical education and research in Australia and New Zealand universities. The organisation comprises the Deans of Australia's current eighteen medical schools and the two New Zealand schools.

Medical Deans welcomes the opportunity to comment on the proposed arrangements for accreditation. This response should be read in conjunction with the response already submitted jointly with the two other peak bodies for the medical education continuum – the Confederation of Postgraduate Medical Education Councils (CPMEC) and the Committee of Presidents of Medical Colleges (CPMC), and the student body, the Australian Medical Students' Association (AMSA).

In general terms, Medical Deans is supportive of the proposed framework for accreditation arrangements, with the following provisos:

- that the accreditation process is independent of Government
- that the Australian Medical Council (AMC)'s current accreditation processes be considered best-practice in terms of finalising the legislative provisions for all health professions
- that there is no diminution of the standards applying to the current accreditation processes for medical education
- that there is no disruption to the accrediting of medical schools during the transition period
- that the resourcing of the new arrangements are sufficient, and continue to be sufficient, to ensure no significant increase to registration fees
- that the membership of accrediting bodies include student and trainee representatives, and a proactive approach is taken to ensuring appropriate representation of Indigenous Australians on the accrediting bodies.

In relation to specific proposals in the Consultation Paper and which have not been addressed in the joint submission:

#### **3.6 Accreditation committees**

##### **Composition**

Whilst the AMC will continue to be the relevant accrediting body for medical education and training for the next three years, and thus the proposed composition of the accreditation committees is not immediately relevant, we believe that consideration be given to ensuring some flexibility in the composition of accrediting committees by enabling co-option or similar so that the committees can be tailored to the particular circumstance without compromising quality or efficiency of the process. We note again that representation from students and trainees should be mandated.

### **3.7 Linkages**

#### **Proposal 3.7.1**

Medical Deans strongly supports the right for an organisation disadvantaged by an accreditation decision of the board to seek a merit or process review and, if required, an external process of review.

### **3.10 Accreditation processes**

#### **Proposal 3.10.2**

Medical Deans strongly supports the proposal for ongoing monitoring of education courses and institutions and the reporting requirements in relation to major curriculum or resource changes and/or adverse events.

These provisions are similar to current accreditation requirements of medical programs and one which ensures the accrediting body is kept in the loop with respect to changes/events which may ultimately impact on registration of graduands. We have found current monitoring and reporting requirements to be a helpful and supportive process.

## **4 Linkages with Commonwealth, State and Territory government bodies**

### **Proposal 4.1**

Medical Deans wholeheartedly support provisions in the legislation which will ensure accountability to the public. With respect to the publication of accreditation reports, in our view there is a need to distinguish between final accreditation reports (which are currently published in full by the AMC) and interim reports, which generally take place during the initial establishment phase of a course. Interim reports are not made public as new courses are 'a work in progress'. We believe that this distinction should continue.

Finally Medical Deans wishes to re-iterate the desirability of the AMC being acknowledged as the ongoing accrediting body for medical education and training, not simply confirmed in this role for the next three years. This confirmation will minimise any impact on the quality or effectiveness of the accreditation process during this period of substantial change to current arrangements.



Professor Allan Carmichael  
**President**