



OPTOMETRY COUNCIL
OF AUSTRALIA AND
NEW ZEALAND
ACN 074 875 111
ABN 38 074 875 111
PO Box 185
Carlton South VIC 3053
Australia
Telephone +61 3 9663 2733
Web: www.ocanz.org

Accreditation Arrangements Submission, Attention: Practitioner Regulation Subcommittee

17 December 2008

Dear Sir/Madam

The Optometry Council of Australia and New Zealand (OCANZ) offers the following comments on the Consultation Paper – Proposed Arrangements for Accreditation.

Terminology

The term ‘standard’ is used in various ways throughout the consultation paper. OCANZ suggests that ‘standard’ be defined and used in Bill B in a way that makes it clear whether it relates to governance or operational standards, accreditation standards or standards against which overseas-trained practitioners are assessed.

‘Accreditation’ is used in the consultation paper (e.g. Section 3.1) to cover both accreditation of courses of education as well as the assessment of overseas-trained practitioners. To do so in Bill B is likely to lead to confusion. The function of accreditation and the function of assessment (of overseas-trained practitioners) are quite distinct. OCANZ has separate processes for, and separate expert committees to oversee, each function.

Determination of accreditation standards

Accreditation standards are fundamental to OCANZ’s accreditation role. For that reason, OCANZ submits that accreditation standards should be drafted and approved by the accrediting body, then recommended to the relevant national board.

The development of accreditation standards by OCANZ is, and will continue to be, a highly consultative process. The national agency could be consulted when standards are being developed but the national agency should have no role in defining or approving those standards.

Contractual arrangements and resourcing

OCANZ agrees with the Optometrists Association viewpoint that ‘the national agency should provide administrative support to the boards which fund it. Such support may include assisting boards or committees of boards with guidance on good regulatory practice when such guidance is sought by boards or committees.’ Accordingly, (d) in the proposed role for the national agency (in section 3.2) is all that is needed.

OCANZ submits that there should not be a contractual relationship between the national agency and the accrediting bodies. The accrediting bodies will be performing statutory functions for the national

board and for that reason the contract should be with the national board. It is understood that this would require the national boards to be established as legal entities.

Accrediting bodies need clear and unambiguous control over the resources needed to perform its roles for the national boards. Further, funding agreements for the accrediting bodies must include core funding and have sufficient flexibility to allow for additional funding should unforeseen circumstances arise. Accreditation costs can be unpredictable when university courses are in a state of flux. It is not uncommon for accrediting bodies to need to act quickly to investigate major course changes that might impact on the course's accredited status and hence ability of graduates to join the workforce.

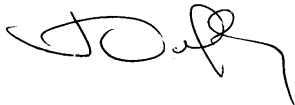
Purpose of Accreditation

OCCANZ endorses the submission of the Australian Dental Council that the definition (in section 3.1) of accreditation is inadequate in that it leaves out the important role that accreditation plays in improving the quality of courses of education and training.

Related to this, is the issue of composition and appointment of the assessment panels (section 3.10). OCCANZ submits that relevant expertise and credibility is critical to assessment panels being able to perform the role effectively, especially in circumstances where the panel needs to challenge an institution with its concerns that accreditation standards may not be met.

OCCANZ submits that it would have serious consequences for the effectiveness and quality of its accreditation process if it was constrained in its selection of panel members by having to include representatives from any particular group.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J. Duffy', with a stylized flourish at the end.

JANE DUFFY
Executive Officer