



SUBMISSION TO:
Practitioner Regulation Subcommittee
Health Workforce Principal Committee

Proposed Arrangements for Accreditation

Consultation Paper November 2008

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17 December 2008

The following document outlines the Speech Pathology Australia submission to the
Australian Health Ministers' Advisory Council





Proposed Arrangements for Accreditation National Registration and Accreditation Scheme for Health Professionals

SPEECH PATHOLOGY AUSTRALIA SUBMISSION December, 2008

Introduction

Speech Pathology Australia welcomes the opportunity to comment on the Consultation Paper – Proposed Arrangements for Accreditation - to the Practitioner Regulation Subcommittee, Health Workforce Principal Committee.

Speech Pathology Australia (The Speech Pathology Association of Australia Ltd) is the national peak body for speech pathologists in Australia, representing approximately 4,300 members. A speech pathologist is a university trained specialist, qualified to provide a variety of services to people with communication and swallowing disorders that may be present across the life span.

Currently the speech pathology profession is registered in only one state, that being Queensland. In the absence of national registration, Speech Pathology Australia has assumed a wide number of governing and 'quasi-regulatory' functions, including setting the profession's entry level standards (Competency Based Occupational Standards), providing accreditation of Australian speech pathology university courses, assessing applicants for skilled migration to Australia, and maintenance of recency and currency of practice of practising members of Speech Pathology Australia, including re-entry to the profession.

The Department of Education, Employment and Workplace Relations has long recognised Speech Pathology Australia's role and contribution as the sole national professional body for speech pathologists. This is confirmed through the formal agreement with the National Office of Overseas Skills Recognition, as an agency of the Department of Education, Employment and Workplace Relations, for Speech Pathology Australia to conduct skills assessment of overseas trained health practitioners intending to apply for migration to Australia under the Australian Government's General Skilled Migration program. Additionally, the Speech Pathologists Board of Queensland, currently the one state-based registration board for the speech pathology profession, defers to Speech Pathology Australia for both the assessment of overseas qualified speech pathologists and the accreditation of university speech pathology programs. In both instances, the determination of Speech Pathology Australia informs the registration decisions of the Queensland Board.

Speech Pathology Australia and the Speech Pathologists Board of Queensland have jointly presented to the government its submission for inclusion in the National Registration and Accreditation Scheme. In this context Speech Pathology Australia is pleased to provide comment on the proposed arrangements for national accreditation.

1. National Accreditation Proposed Arrangements

The principles for national accreditation as outlined in the consultation paper include:

- (a) provide for the protection of the public by ensuring that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered and that practitioners have the skills and competencies to meet the health needs of the Australian community
- (b) ensure that the process of assessment of courses and qualifications is undertaken independently from government, health professional educators and the profession





- (c) have regard to the need to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and enable innovation in education and service delivery
- (d) ensure the provision of an accreditation system for the health professions that is transparent, accountable, rigorous, effective, efficient, and fair
- (e) provide rigorous and responsive assessment of overseas trained practitioners that protects the public by ensuring practitioners meet appropriate standards
- (f) accord with Australia's international obligations and relevant internationally accepted standards, and
- (g) reflect the wording and intent of the IGA and additional provisions in Bill A which were developed following consultation.

Speech Pathology Australia supports the intention and directions of these principles. Further the Association supports the overarching view that the power to accredit education and training courses and the assessment of the equivalence of qualifications and the competence to practise of overseas trained practitioners are essential elements of a contemporary health practitioner regulatory system. The interconnection but necessary independence of the functions of registration and accreditation can exist within the proposed regulatory model.

It is suggested however that clarification be made with respect to principle (b) in that on one hand it is outlined that 'assessment of courses and qualification is undertaken independently from government, health professional educators and the profession', however this contrasts in part with later structural proposals that the accreditation committee include members from the profession and in particular those with expertise in education. It is vital that the profession is involved as it is the profession that is best placed to understand the specific training and competency requirements of those discipline-specific professionals in the context of the changing clinical and workplace needs.

Speech Pathology Australia welcomes the IGA's transitional arrangements whereby existing accreditation bodies can be assigned the proposed accreditation functions. As such, Speech Pathology Australia believes it can meet the standards and criteria set by the national agency within the first 12 months and continue throughout the 3 year transitional period, and potentially beyond. In particular, Speech Pathology Australia already has well established **processes for assessing individual qualifications and courses of training**. Its accrediting procedures have input from the **profession and education providers** and currently we are reviewing the accreditation panel structure to include **consumer/community representation**. As will be later discussed the **financial structure** has allowed for very cost effective and financially self-sustaining mechanisms. There have always been very **positive collaborations** between the profession, Association, Queensland Board and the universities, and there is **ongoing review of standards and guidelines** including a current review of the entry level standards for the speech pathology profession and a review of specific accreditation procedures.

The specific proposed accreditation functions are noted as:

- (a) assess courses of study and determine whether they meet the approved accreditation standards and advise the relevant board;
- (b) assess accrediting authorities in other countries to determine whether courses of study that those authorities accredit provide practitioners with the required knowledge and clinical skills to practise in Australia and advise the relevant board;
- (c) provide an internal merits and process review of decisions made in relation to the accreditation of education courses and institutions;
- (d) oversee the assessment of the knowledge and clinical skills of overseas trained practitioners whose basic qualifications are not recognised in the list of approved





courses of study and make recommendations to the board's registration committee regarding the suitability of an applicant's knowledge and clinical skills for registration in Australia and advise the relevant board in respect to an individual's application for registration; and

- (e) be permitted to undertake other functions outside the scope of the national scheme as long as there is no conflict of interest between the assigned functions and any other function carried out by the accreditation body in its own right.

Of these, Speech Pathology Australia currently performs all with the partial exception of (b) involving the assessment of accrediting authorities in other countries. Through our involvement in the Speech Pathology Profession's Mutual Recognition Agreement (2004, updated 2008), there is mutual recognition of the training and credentials of speech pathologists who are practising members of the speech pathology associations of UK, USA, Ireland, Canada, New Zealand and ourselves in Australia. While there are country-specific additional requirements, the training and qualifications are recognised as substantially equivalent for graduates of courses of these countries. Outside these 5 countries, Speech Pathology Australia has no current mechanism for assessing specific training courses or the accrediting bodies of other countries, and rather applicants from wider countries are assessed comprehensively against the competency based occupational standards set by the Association in order to determine their competency and currency of practice required for the practice of speech pathology in Australia. There will be merit in discussing the continuance of this arrangement, as against assessing the accrediting bodies across a wide number of countries.

Comment on specific aspects of Current and Proposed Accreditation arrangements will follow.

2. Current accreditation arrangements

Background on accreditation of speech pathology courses

In the opening sentence (pg 7) it is stated that accreditation is currently the role of health practitioner registration boards under respective statutes. As has been discussed, this is not necessarily the case for all professions. As indicated, accreditation of speech pathology training courses and skilled migration assessment has long been conducted by Speech Pathology Australia and recognized by both the government and the one speech pathologists registration board. This fact reinforces that registration and accreditation while intimately connected can occur independently or at least auspiced under different bodies, providing appropriate governance structures are in place.

To expand on the current role of Speech Pathology Australia in its accrediting function, the following is an overview of current principles and procedures:

Speech Pathology Australia grants accreditation to speech pathology degree programs that meet certain established and documented requirements.

Accreditation assures the general public that the speech pathology degree programs in Australia have the appropriate qualities to produce professional speech pathologist practitioners who are eligible for membership of Speech Pathology Australia.

A speech pathology degree program accredited by Speech Pathology Australia permits only those students who have achieved the entry-level standard specified in the Competency Based Occupational Standards to graduate. The Competency Based Occupational Standards for Speech Pathologists – Entry Level (CBOS 2001) is accepted by the profession





as the expression of the knowledge, skills and attitudes required of someone entering the profession of speech pathology in Australia.

By accrediting speech pathology degree programs, Speech Pathology Australia aims to:

- Maintain appropriately high minimum standards of the speech pathology profession in Australia
- Stimulate maintenance of high standards and continuing improvement in the quality of professional education in speech pathology
- Provide support to the university programs to encourage excellence in professional preparation
- Support varied and flexible degree programs that are aligned with the changing realities of the speech pathology workplace.

Speech Pathology Australia has been responsible for the accreditation of all Australian university educational programs to educate speech pathologists to entry level since the inception of such programs in 1962. Since the year 2001 the accreditation of speech pathology courses has been based on outcomes and an in-depth evaluation of the assessments of competency achieved by graduating students.

The Association's accreditation process is designed to assure that graduates would be of a sufficient level academically and practically for them to practise as a speech pathologist at entry level. It considers that professional accreditation should necessarily take into consideration in great depth the specific content of program especially in relation to:

- the relevance to the profession as it exists in Australia,
- the scope of the content,
- the level at which it is taught and learned
- the experiences of the students that are required for them to achieve competency (i.e. clinical practicum).

The accreditation evaluation has been built around the explicit entry level standards of the profession (CBOS 2001) which are nationally and internationally recognised. These standards are well accepted by the profession, the universities and employers in Australia and are the basis for successful mutual recognition negotiations with international professional associations (RCSLT (UK) CASLPA (Canada) ASHA(USA)) [Mutual Recognition Agreement 2004] and subsequently IASLT (Ireland) and NZSTA (New Zealand) [MRA 2008].

Funding arrangements

Speech Pathology Australia provides a most economical accreditation which takes into account the participation of all the universities in Australia in supplying personnel to work on the accreditation panels on a pro-bono basis. There has been no direct cost to the government and low costs for the universities have been maintained over the years, with the Association absorbing considerable direct and indirect costs and infrastructure to support the process. There has been no contribution to this process from the Speech Pathologists Board of Queensland. However with a more complex and larger structure proposed and remuneration of panel members possibly expected, costs will increase and contributions from registration fees plus a review of the university fee will be required.

Linkages

With respect to Linkages, as has been indicated, there are strong formal links between the various government departments (Skilled Migration Program, Department of Education, Employment and Workplace Relations, and Department of Immigration and Citizenship) and Speech Pathology Australia in regard to the conduct of assessment of overseas trained speech pathologists intending to apply for migration to Australia and practise in this





profession. Statutory requirements and best practice principles in undertaking this role are assessed and have been satisfactorily met at all times.

Additionally the section of DEEWR concerning overseas assessment and international recognition (AEI – PSDP) have been key partners in a number of projects to facilitate international mobility of the profession and have provided support for the development of the profession’s two agreements for the Mutual Recognition of Professional Association Credentials.

3. Proposed new accreditation arrangements

3.1 Key features of the proposed system

Under the proposed new accreditation arrangements, the accreditation function consists of at least four inter-related but separate activities:

- (a) the development of accreditation standards
- (b) the assessment of individual education and training courses and institutions against those standards
- (c) the assessment of overseas accrediting authorities to determine whether the courses they accredit provide the required knowledge and skills to practise in Australia, and
- (d) the assessment of individual overseas trained practitioners qualified in courses which are not recognised in Australia.

These core functions are considered to be appropriate and achievable. As indicated previously the Accreditation process developed by Speech Pathology Australia is considered to be competency outcome based (as against inputs) and allows for flexibility rather than prescription of course content. As also suggested, modification to the requirement of (c) should be considered with respect to the competency based assessment of those applying with overseas qualifications.

As stated, the purpose of accreditation is to ensure that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered. Further stated is that the purpose of accreditation of education and training courses is to ensure that graduates have the required skills, knowledge and competence to practise safely and meet registration requirements. This specific intent has underpinned the current conduct of accreditation by Speech Pathology Australia whereby the explicit objective is to “assure the general public of the quality of the speech pathology degree programs provided in Australia and, by direct inference, of the quality of professional speech pathologists graduating from any of the accredited programs” (Speech Pathology Australia, 2007). Currently, the Association’s accreditation process provides a guarantee of the acceptability of the graduates as eligible for practising membership of Speech Pathology Australia, which is the current basis of conferring professional recognition for this profession.

Under the proposed model, documented within the IGA, accreditation will be conducted independently from registration whereby accreditation functions will be assigned by Ministers to existing external agencies or will be undertaken by accreditation committees of boards which will be required to have relevant educational expertise and professional representation. It is imperative that the skills and expertise of academics and clinicians of the profession possessing sound educational knowledge and experience in accreditation can continue to be drawn upon to conduct accreditation assessments. These panel members must necessarily be independent of the organisation being accredited and pose no potential conflict of interest from a commercial or personal perspective. This is the current position taken by Speech Pathology Australia in forming each accreditation panel. Current





mechanisms to ensure no conflicts of interest and the rights of appeal of decisions, while already in place, can be strengthened to meet any requirements in this regard.

It is stated that once the accreditation body has established the accreditation standards for a profession, these will be submitted to the relevant national board for consideration. As the professional body that has developed the entry level standards for the speech pathology profession, this role in recommending standards to the registration board is congruent with existing functions and the relationship between the Association and current registration board. The current standards for the profession, Competency Based Occupational Standards – Entry Level (Speech Pathology Australia, 2001) have served as the underpinning standards and framework for a range of related functions ie university course accreditation, eligibility for practising membership, overseas qualifications assessment and re-entry to the profession. While the Registration Board will oversee the development of registrations standards, to be approved by the Ministerial Council, these must be informed by the accreditation standards, which are in turn underpinned by the profession-specific practice competency standards.

Speech Pathology Australia is an independently constituted organisation and will not be unreasonably restrained in other activities it can undertake. As such it will be able to perform its accreditation functions independently and transparently from the registration board itself and can ensure other activities it does undertake are free of conflict of interest with its accreditation responsibilities.

Under the new national law it is envisaged that the method of negotiating and formalising arrangements between national boards, accreditation bodies or committees and the national agency will be twofold. Firstly the National Law Bill (Bill A) requires each national board to negotiate a 'health profession agreement' that will make provision for an annual budget including funding to assigned accreditation bodies and the services to be provided with this budget. Further to this, it is understood that where an external body is assigned the accreditation functions of the national board, a contract will be negotiated between the agency/board and the external body, this forming part of the health profession agreement. Speech Pathology Australia is committed to being party to such an agreement.

It is stated that the costs of registration will be subsidised by registration fees under the contractual agreement with other expenses of the accreditation body met by cost recovery of services provided. It needs to be noted in this context that the speech pathology profession is relatively small and economies of scale must be considered in the financial structure of both registration and accreditation functions. In particular, a costly and cumbersome structure with committees and panels of the registration board replicated in each state is not necessary for a small profession. A single national structure for registration, accreditation and disciplinary hearings will be adequate and appropriate for a profession the size of speech pathology. Importantly this will keep costs for the government and profession to a low level and will be reasonable for individual practitioners who largely work in the public sector and do not attract high salaries. Functions of university accreditation and the assessment of those with overseas qualifications have to date been conducted by Speech Pathology Australia in a manner that is mindful of keeping costs low, while allowing the full execution of duties in a quality and expert manner. Cost recovery already is the basis of this, with the profession (Speech Pathology Australia) and the relevant parties, universities or individual overseas practitioners, contributing to these costs.

In regard to university course accreditations, the current costs are considered very low compared to those conducted for other professions. Contributing to this is that accreditation panel members are drawn from a pool of accreditors nominated from each university, with one nominee expected per each program offered (ie Bachelors or Entry Level





Masters). There is no payment made to accreditors with the exception of the senior panel moderator (or her delegate) who is a member of staff of Speech Pathology Australia. The fees themselves primarily cover the costs of site visits and administrative costs incurred by the Association. In considering the structure of the panels (as outlined on pg 5 of the Discussion paper) while a wide representative panel is important, the size and expectation of payment needs to be considered as it would not be desirable that costs blow out under this new arrangement.

Similarly the skilled migration assessment of those with overseas training in speech pathology has been kept at a relatively low cost. While eligibility assessors are employed or contracted by Speech Pathology Australia to participate in this function, the costs overall are reasonable and is not felt to be an impediment to the decision to elect to enter the profession in Australia. This is important from a workforce supply perspective.

So while it is reasonable that the National Board contribute to the costs in some manner, there needs to be a balance between the financially self –sustainability of profession-specific boards and minimisation of registration fees for practitioners. Lessons can be learned from existing organisations, such as Speech Pathology Australia, in the current economical conduct of both accreditations and skilled migration assessment.

3.2 Roles in relation to accreditation

The roles of the levels of National Registration and Accreditation Scheme appear appropriate and well structured. The roles of the Ministerial Council, Advisory Council, and National Agency are supported by Speech Pathology Australia. Costs associated with this structure however need to be borne relative to the size of the profession and infrastructure and administrative support required. Smaller professions with possibly lower agency input requirements should be able to build its operating structure and set fees corresponding to need.

The role of the National Boards while substantially appropriate lends itself to some potential conflict or at best ambiguity with the Accreditation Board in regard to points (c) and (e) where an ‘overseeing’ role for the development of accreditation standards and assessment of overseas trained health practitioners. Clarification of the term ‘overseeing’ is necessary, given the context of also requiring independence and transparency of the accreditation bodies.

The roles of the Accreditation body are appropriate and can be met by Speech Pathology Australia. The statement on the accreditation body consulting widely on the development of standards is strongly supported as it is vital that the profession is a key driver in the development and maintenance of its professional standards.

3.3 Initial Assignment of accreditation functions to existing national accreditation bodies.

Speech Pathology Australia is the only body that performs an accreditation role for the speech pathology profession. As a partially registered profession a submission has been made to be included in the National Registration and Accreditation Scheme. If the profession is included in the National Scheme, Speech Pathology Australia would welcome the invite to continue to perform the functions of university accreditation and overseas qualifications assessment.





3.4 Scope of Accreditation

The scope of **core accreditation functions** as defined in the IGA is supported.

It is agreed that the scope and complexity of accreditation functions and workload will necessarily involve the size of profession and extent and complexity of education and training requirements including base qualifications and any specialisation. The speech pathology profession currently does not have any formal specialisations however it is recognised that some areas of practice are above that of entry-level competency. The profession does not have any formal mechanisms for **conferring specialisation** and at this stage considers that credentialing of advanced practice areas should be managed and governed at a workplace level (Speech Pathology Australia, 2008). Should this situation change over time, there needs to be the facility under accreditation procedures to accredit specialisation training/certification.

With respect to **additional functions** in relation to the national scheme, there is a suggestion that broader functions that may be requested of an accrediting body or committee could include for example providing services relating to continuing professional development. While it will be appropriate for National Boards to set standards for currency of practice, it is considered inappropriate for Boards to deliver professional development. This would not be considered 'core function' and would unnecessarily replicate what is provided already by professional bodies (Associations) and various training organisations. Speech Pathology Australia has a very strong Continuing Professional Development (CPD) program with minimum requirements for CPD linked to its practitioner certification program 'Professional Self- Regulation Program (PSR) 2001'. Members of Speech Pathology Australia who meet the requirements of the PSR successfully gain the status of Certified Practising Speech Pathologist. This certification program should remain outside the scope and function of the accreditation body.

It is supported however that external accreditation bodies should be able to conduct activities outside the scope of the scheme in any way it seems fit providing it is not in conflict with its contractual arrangements.

3.5 Governance arrangements for external accreditation bodies

It is understood that Speech Pathology Australia may need to adjust its governance arrangements in regard to accreditation to meet the Scheme's requirements. Speech Pathology Australia is an independently incorporated body, however there may be merit in establishing a separate governing board or committee for its accreditation function. It is recognised and supported that external accreditation bodies will need to provide for community input and promote input from education providers and the profession but also provide independence in decision making. There is well established input of academics and the profession in the accreditation panel of Speech Pathology Australia and currently the Association is undergoing a review of its processes and panel membership to include community and/or consumer representation.

A contractual arrangement with the national agency will be practical and feasible to be put in place.





3.6 Accreditation Committees

Composition of accreditation committees

Under 1.39 it is proposed that an accreditation committee comprise members who bring expertise from the profession, education, and from health policy. In particular it is proposed that the committee include:

- (a) Registered practitioners
- (b) Persons with education and training expertise
- (c) Persons who are not members of the relevant profession; and
- (d) at least two persons who are also members of the respective registration board of the agency.

It is suggested that potentially 8 members comprise the committee, allowing 2 from each of the categories above. While it is stated that the size of the committee remain efficient, there is no discussion in regard to the potential additional costs that may result from a larger governing structure such as this. There needs to be a distinction drawn also between the governing structure and smaller accreditation panels drawn from a pool of accreditors for a specific university accreditation. Speech Pathology Australia has operated in this way, with a small accreditation panel formed for each accreditation. In addition to the panel, which includes a consistent moderator, an arbitrator is nominated in the event that there is a challenge to the decision made. The smaller panel ensures that site visits to the university are practical and efficient and has the effect of minimising costs. A requirement of including even at least one from the four categories will increase costs, which would need to be passed on to the universities and practitioners. The advantage of including university staff as panel members is that they have the appropriate academic and educational framework upon which to draw accreditation expertise. They also have an interest in ensuring that accreditation of courses is conducted in a fair and equitable way and that the costs to universities are minimised through their pro-bono engagement in the process. It is considered that conflict of interest issues and independence in decision making can be achieved even within the context of engaging professional educators employed within speech pathology programs in the accreditation committee and/or panels.

Similarly in terms of scale, while Speech Pathology Australia has a team of trained assessors of overseas trained applicants, two only are nominated to review the application of each full candidate (with only one assessor required for applicants under the streamlined Mutual Recognition Agreement application process).

Regardless of the background and expertise of Accreditation committee and panel members, it will be vital that ongoing training and support be provided to ensure a high quality, consistent and equitable process is maintained.

Speech Pathology Australia concurs fully that the process of calling for nominations and selection of members of the Committee be open and transparent.

3.7 Linkages

Registration and accreditation

It is agreed that both registration and accreditation functions should be the ultimate responsibility of the one National Board, however it is important that decisions concerning both functions remain independent, albeit registration decisions informed by decisions regarding course accreditation. It is not appropriate or desirable for decisions concerning a course accreditation based on sound professional opinion against predetermined standards to be overruled by another body. The statement that 'Boards must have the power to be able to resolve these issues' is unclear and could potentially lead to a non-transparent and interference model.





Review and appeal provisions

It is agreed that an appropriate and defensible review and appeal process be in place as a part of the Accreditation scheme. As stated the first level of appeal should be through internal merit or process review. The option for external appeal is appropriate but caution is required to avoid expensive processes and self-interest.

3.8 Indemnity

Speech Pathology Australia agrees *'that the national scheme legislation will provide that all bodies and their agents under the scheme will be indemnified for work performed in relation to the scheme. These indemnity arrangements will extend to external accreditation bodies and committees and persons acting for those bodies and committees'*. This however should be considered in the context of professional liability insurances that may already be held by individuals and organisations.

3.9 Funding arrangements

Speech Pathology Australia, as a relatively small profession, strongly supports that registration and accreditation activities are not cross-subsidised between professions and that the fees for each profession are set at a level that supports the regulatory activities for that profession only. Where common overhead costs are allocated across professions, this should be done on a pro-rata or fee for service basis. It should be noted that not all administrative and infrastructure costs may be required equally.

3.10 Accreditation Processes

It is agreed that accreditation processes need to meet Australian and international best practice standards and that processes are rigorous, transparent and fair.

Professions Australia's 'Standards for Professional Accreditation Processes' (Professions Australia, 2008) mirrors well the practices and processes of Speech Pathology Australia and it is reasonable to expect that the Good Practice principles and conduct of business policies would be met.

Similarly the principles and structure for accreditation outlined by the World Health Organisation/World Federation of Medical Education Guidelines for Accreditation of Basic Medical Education (2005) highlight the main elements of a contemporary accreditation process. These are consistent with the accreditation procedures of Speech Pathology Australia, which include:

- Self Evaluation including detailed documentation of the structure of the degree program, and how the program assesses students according to the standards articulated in CBOS 2001
- Site visit – involving the Accreditation panel, university staff, representatives of clinical educators, field clinical supervisors and students
- Preliminary report – to which the university can respond
- Further information requested and provided where required
- Final Report and recommendations – stating period of accreditation or any conditions
- Appeal process if initiated
- Annual reporting of any program changes and re-accreditation verification.

Relationship between registration and accreditation functions

Speech Pathology Australia currently maintains a process whereby universities of accredited courses must report on an annual basis any changes in the program or resource implications that may impact on the delivery of the course and successful completion of all requirements by students to meet the profession's entry level standards.





4. Linkages with Commonwealth, State and Territory government bodies

It is understood that there will be several linkages with Commonwealth, State and Territory health departments. Under the IGA, the Ministerial Council will be responsible for approving accreditation standards, if they are submitted by a national board with a recommendation that they be approved.

It is agreed that it is also important to ensure clear communication and cooperation with government education agencies, such as State and Territory and Commonwealth education departments.

Speech Pathology Australia supports that accreditation reports 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.

5. International Linkages

Speech Pathology Australia supports 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. This is already in place for the speech pathology profession.

6. Transitional Arrangements

Speech Pathology Australia supports the transitional arrangements as outlined.

In summary, Speech Pathology Australia, the current single national peak body for the speech pathology profession, is pleased to provide the above comments on future national accreditation arrangements. We would be pleased to comment further where required and look forward to receiving further advice on the Health Workforce Principal Committee's deliberations and directions on this matter.

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