

Health Professions Accreditation Councils' Forum

18 July 2014

Higher Education Panel Executive

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Submission in Response to Call for Comment on the Proposed Higher Education Standards Framework

The Health Professions Accreditation Councils' Forum is pleased to have the opportunity to make a submission to the Higher Education Standards Panel in response to the Call for Comment on the Proposed Higher Education Standards Framework April 2014. The Forum thanks the Panel for the extension of time to make this submission.

About the Health Professions Accreditation Councils' Forum

The Health Professions Accreditation Councils' Forum ('the Forum') is a coalition of the external accreditation authorities of the regulated professions. Each of the Councils is appointed under the *Health Practitioner Regulation National Law Act 2009* (the National Law) as the external accreditation authority for the relevant profession-specific National Board and is part of the National Registration and Accreditation Scheme (NRAS).

The Forum comprises:

- Australian Dental Council
- Australian Medical Council
- Australian Nursing and Midwifery Accreditation Council
- Australian Pharmacy Council
- Australian Physiotherapy Council
- Australian Psychology Accreditation Council
- Australian and New Zealand Osteopathic Council
- Australian and New Zealand Podiatry Accreditation Council
- Council on Chiropractic Education Australasia Inc.
- Optometry Council of Australia and New Zealand
- Occupational Therapy Council (Australia and New Zealand)Ltd

The Forum has been meeting regularly since 2007 to consider matters of common interest, principally matters concerning the accreditation of education and training programs in the health professions.

The Forum responds collectively to consultation processes and papers on matters common to the relevant professions.

This submission constitutes the response of the Forum and is generally confined to issues that are common to all the health professions. Each member Council may make a separate submission. The views expressed below do not override any views expressed by a member Council in its own separate submission.

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Accreditation under the *Health Practitioner Regulation National Law Act 2009* (the National Law)

The *Health Practitioner Regulation National Law Act 2009* (the National Law) implements the Council of Australian Governments' agreement to establish a national registration and accreditation scheme. The National Law specifies a range of functions for the national agency (the Australian health Practitioner Regulation Agency – AHPRA) and the national boards and a number of accreditation functions.

Under the National Law Section 42 defines accreditation functions quite broadly. The objectives relating to facilitating the provision of high quality education and training of health practitioners (s3(2)(c)) and facilitating the rigorous and responsive assessment of overseas qualified practitioners (s3(2)(d)) relate directly to accreditation functions. Accreditation standards and accreditation of programs of study against those standards are fundamental determinants of the quality of the education and training of health practitioners. Accreditation authorities develop processes to assess overseas qualified practitioners and undertake those processes, and therefore control the responsiveness and rigorousness of those assessments.

Accreditation authorities exercise accreditation functions under the National Law specified in an agreement with AHPRA on behalf of each profession national board. The provisions for accreditation in the National Law indicate that there is a necessary separation of the role of the accreditation authority and that of the national board in relation to the following regulatory responsibilities:

- the accreditation authority is required to develop accreditation standards, to use these standards to assess programs of study and the education providers that provide these programs, and to accredit programs of study and their education providers which meet the accreditation standards;
- the national board is required to approve the accreditation standards [s35(c)(i)], and to approve accredited programs as providing a qualification for the purposes of registration or endorsement in the health profession [s35(d)].

Accreditation Councils review their accreditation standards regularly, with wide consultation, and when doing so review the current higher education standards and align standards and terminology where possible.

Comment on the Proposed Higher Education Standards

The Health Professions Accreditation Councils were pleased to receive a presentation at a meeting of the Forum by Dr Lindsay Heywood, in May 2014, which provided a helpful background for the members' consideration of the proposed framework.

In response the majority of the Councils have advised that following their individual review of the proposed higher education standards they consider the new standards to be clear, well written and well structured, and that they are in agreement with the changes proposed. The Framework is considered to be easy to follow, more student centred and less repetitious than the previous version of the standards. Councils consider the expectations reasonable, and that they will provide a good foundation for the profession specific standards and assessment of education providers and the education and training programs undertaken by the accreditation councils.

Some Councils noted positively several aspects of the proposed higher education standards framework, in particular the inclusion of the specific reference to knowledge and skill required for registration for practice in the Learning outcomes (1.5:2c); and the statement about the capacity for

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independent and critical thought, and for life-long learning in the Learning outcomes: (1.5:2d) as these are congruent with the current expectations for educational practice.

It was noted that it is especially positive to see specific statement that “educational policies and practices support participation by Aboriginal and Torres Strait Islander people and are sensitive to Aboriginal and Torres Strait Islander knowledge and culture” in the section on Corporate Governance (6.1 2f), as high-level policies and procedures are necessary to support profession course level activity, and accreditation authority standards, related to inclusion of Aboriginal and Torres Strait Islander peoples’ perspectives.

General

The Accreditation Councils in various fora, and particularly through the Health Professions Accreditation Councils' Forum, have been engaged in general discussions about the common aspects of accreditation, both in the processes and the standards, and in looking to the possibilities for improvements and opportunities for streamlining.

The Higher Education Standards Framework is intended to have a broader purpose than that of the accreditation standards, the Higher Education Standards are overarching and not discipline specific and are not intended to replace the standards for the accreditation of programs. However, the Accreditation Councils, as the discussion on streamlining accreditation progresses, will be able to consider using the ‘architecture’ provided by the proposed Higher Education Standards Framework as a context for the discipline specific detail of the health professions accreditation standards and processes.

Further Information

Should the Committee require further information the Chair of the Health Professions Accreditation Councils' Forum would be happy to expand on the comments made in this submission on behalf of the Forum.

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