



HEALTH
PROFESSIONS
ACCREDITATION
COLLABORATIVE
FORUM

Australia's accreditation authorities
for regulated health professionals

ACCREDITATION MANAGERS SUB-COMMITTEE

Understanding the use of conditions in Accreditation in the National Registration and Accreditation Scheme

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Introduction

The National Registration and Accreditation Scheme (NRAS) includes health professions regulated by 15 National Boards, with registration of paramedicine joining the Scheme from 1 December 2018. According to the Australian Health Practitioner Regulation Agency's (AHPRA's) 2018/2019 annual report, this includes over 1,000 approved programs, delivered by 130 education providers and which incorporate 180,889 students studying to become registered health practitioners.

NRAS requires that the accreditation authority appointed by the National Board for each profession accredits programs of study that enable graduates to apply for registration as a health practitioner.

Each of these programs of study must be accredited by the accreditation authority for the health profession and subsequently approved by the relevant National Board to enable graduates to apply for registration.

Each accreditation authority publishes the policies and processes by which they accredit programs of study and monitor the programs that they accredit. Across the 14 authorities currently appointed (including five Committees of National Boards), there have been historical differences in approach and terminology as well as profession-specific differences.

The Members of the Health Professions Accreditation Collaborative Forum (the Forum or HPACF) are committed to working together to review and continue to improve the efficiency of accreditation processes.

The Forum recognises the impact accreditation has on education providers within the NRAS and is working to improve efficiency whilst still adhering to the overall objectives of the NRAS to ensure that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

The Forum Members have agreed to contribute to simplifying accreditation processes for education providers by agreeing to common terminology.

One other area identified and highlighted for review is the way in which accreditation authorities use conditions of accreditation. A common approach to how conditions are used may have significant benefits for education providers while also improving transparency and accountability within the Scheme.

The National Law defines that a possible outcome of accreditation is that: ***“...the program of study and the education provider that provides the program of study, substantially meet an approved accreditation standard for the profession, and the imposition of conditions on the approval will ensure the program meets the standard within a reasonable time.”*** (Health Practitioner Regulation National Law, 2009).

Project – Commonality across accreditation reports

The HPACF Strategic Action Plan 2017 - 2019 included the strategic objective of improving efficiency of program of study accreditation processes by developing cross-professional policies and guidelines. A specific deliverable under this objective was the development of consistent approach to accreditation assessment processes. Consequently, the HPACF Accreditation Managers Sub-Committee was tasked with a project to look at the commonality

across accreditation reports, and the consequent development of good practice guidelines to applying conditions and quality improvement recommendations.

Objectives and aims

The overarching objective of this project is it to improve efficiency across the NRAS by developing cross-profession policies and guidelines relating to how accreditation authorities undertake accreditation activities.

To achieve this objective, the sub-committee first undertook to understand how conditions are used and what impact any changes proposed may have.

By promoting a consistent approach to the outcome of accreditation assessments and creating cross-profession policies and guidelines relating to conditions, the aim is to:

- increase transparency within the NRAS;
- reduce unnecessary burden on education providers;
- reduce the direct and in-direct costs of accreditation to education providers and accreditation authorities;
- provide clear information to all stakeholders, including students, education providers, National Boards and consumers about the accreditation status of programs.

Rationale

The following rationale is provided as to why conditions of accreditation have been chosen as a focus to improve efficiency within the NRAS:

- All accreditation authorities use conditions, therefore the use of conditions has the potential to impact all accredited programs across all of the 330 education providers currently offering accredited and approved programs.
- There is provision within the *Health Practitioner Regulation National Law Act 2009* (the National Law) for the use of conditions if an accreditation authority is reasonably satisfied the program of study and the education provider that provides the program of study substantially meet an approved accreditation standard for the profession and the imposition of conditions on the approval will ensure the program meets the standard within a reasonable time.
- The cost for education providers to comply with conditions may be significant.
- Conditions (if published) can increase the transparency of how authorities exercise their assigned accreditation function. Increased transparency enables accreditation authorities to learn from each other to improve the efficiency of the National Scheme by removing confusion or misunderstanding.

Understanding current practice

To inform how different accreditation authorities use conditions, information has been gathered from each of the authority's websites, by reviewing policy and process documents publicly available as of November 2018.

It was identified that several accreditation authorities at the time of writing are in the process of reviewing accreditation standards against which programs are assessed as well as the evidence guides and guidelines supporting these processes. In such instances, information as presented is taken from policies and processes in use at the time of writing.

Comment was sought from accreditation authorities via the HPACF Managers Sub-Committee in December 2018, April 2019 and October 2019, with updates to the document incorporated to reflect changes made since the comparison was undertaken in November 2018.

In understanding how conditions of accreditation are used, the following questions were considered:

1. Does the accreditation authority define what a condition is?
2. Does the accreditation authority explain why a condition may be applied to a program?
3. Is there information publically available to identify if a program is subject to a condition or conditions of accreditation?
4. Does the accreditation authority publish its accreditation decisions including conditions?
5. If conditions are published, do conditions tend to focus on inputs or outcomes?
6. Are conditions applied to all programs regardless of outcome?

The information gathered is presented in table 1, with further detail provided at an individual accreditation authority level in subsequent sections.

Table 1 and the subsequent sections include summaries of the information publically available. It is important to note that an accreditation authority may apply outcomes focussed accreditation conditions on accredited programs, but if the conditions are not published, it is difficult to verify and as such the input/outcomes focussed column is reported as unknown.

Paramedicine is not included within the following analysis as at the time of writing, accreditation standards and policies were under development and yet to be published.

Table 1. Summary of accreditation authorities' use of conditions

Accreditation authority	Explanation of a condition/why conditions are applied	Identifies programs with conditions of accreditation	Publishes accreditation conditions	Input / outcome focused conditions	Uses conditions for all programs
Aboriginal and Torres Strait Islander Health Practice Accreditation Committee	✓	Unknown	✗	Unknown	Generally for new programs
Australasian Osteopathic Accreditation Council	✓	✗	✗	Unknown	For all new programs
Australian and New Zealand Podiatry Accreditation Council – Until 30 June 2019 Podiatry Accreditation Committee – From 1 July 2019	✓	Until 30 June 2019	✗	Unknown	For all new programs
Australian Dental Council	✓	✓	As a result of a visit or review	Mixed	✗
Australian Medical Council	✓	As a result of a visit or review	As a result of a visit or review	Mixed	✓
Australian Nursing and Midwifery Accreditation Council	✓	On APoS	✗	Mixed	No
Australian Pharmacy Council	✓	✓	✗	Unknown	✗
Australian Physiotherapy Council	✓	✗	✗	Unknown	For all new programs

Accreditation authority			Explanation of a condition/why conditions are applied	Identifies programs with conditions of accreditation	Publishes accreditation conditions	Input / outcome focused conditions	Uses conditions for all programs
Australian Council	Psychology	Accreditation	✓	✓	✗	Unknown	✗
Chinese Committee	Medicine	Accreditation	✓	✓	✗	Unknown	✗
Council on Australasia	Chiropractic Education		✗	✗	✗	Unknown	For all new programs
Medical Radiation Practice Accreditation Committee			✓	✓	✗	Unknown	✗
Occupational Australia Ltd	Therapy Council of		✓	✓	✗	Unknown	For all new programs
Optometry Council of Australia and New Zealand			✓	✓	✓	Outcomes focused	For all new programs

Aboriginal and Torres Strait Islander Health Practice Accreditation Committee

The Aboriginal and Torres Strait Islander Health Practice Accreditation Committee publishes the *Aboriginal and Torres Strait Islander Health Practice accreditation process* July 2017 on the Board's website. Under section 10.4 it states:

"The Accreditation Committee may decide to impose conditions on the accreditation of a program if Accreditation Committee determines that, on the basis of the assessment team's findings:

- a) the education provider and program substantially meet the approved accreditation standards, and
- b) the imposition of conditions will ensure all approved accreditation standards are met within a reasonable time."

The process describes that as a condition of accreditation for a new program, that a site visit will be completed within 12 months of the of the Committee's original accreditation decision. The process describes that this may not be required if a site visit has already been undertaken.

Section 11.3 advises of the requirement of education providers to respond to conditions and provides a list of the types of responses the committee may require including:

- a) written submissions from the education provider
- b) site visits and teleconferences
- c) meetings by the assessors with groups or individuals, including with representatives of the education provider, or
- d) any other type of response the committee considers appropriate in the circumstances.

Under the 'Accredited programs' section of the Board's accreditation website, a list of accredited programs is shown. It is not clear if there any of the accredited programs listed are subject to a condition or conditions.

No information is available regarding conditions that have been imposed by the Committee to determine if they are input or outcome focused.

Australasian Osteopathic Accreditation Council

The Australasian Osteopathic Accreditation Council (AOAC) publishes the *Procedures for the Accreditation of Osteopathic Courses in Australia* July 2016. The procedures advise that the outcome of an accreditation assessment may be full accreditation or conditional accreditation.

Conditional accreditation is granted when full compliance with one or more of the specified standards has not be demonstrated. New courses applying for accreditation may be accredited, with conditions. Full accreditation may only be granted once a course has produced at least one cohort of graduates and had demonstrated that it meets the relevant approved accreditation standards.

A list of programs accredited is published on the AOAC website with the accreditation status stated, however it is unclear whether any of the programs are subject to conditions.

No information is available regarding conditions that have been imposed by the AOAC to determine if they are input or outcome focused.

Australian and New Zealand Podiatry Accreditation Council / Podiatry Accreditation Committee

On 1 July 2019, the accreditation functions under the NRAS for podiatry programs transitioned from the Australian and New Zealand Podiatry Accreditation Council (ANZPAC) to the Podiatry Accreditation Committee.

The *Accreditation Procedures for Podiatry Programs in Australia and New Zealand*, November 2016, as developed by ANZPAC remain in place at the time of writing. The Procedures provide an explanation as to why conditions are applied replicating section 48 1(b) of the National Law.

The procedures explain that when determining whether or not an accreditation standard is met that an assessment will be made against the following:

- Has the standard been substantially met (noting that a definition of substantially does not currently exist under the National Law)?
- By imposition of a condition/s, can evidence to demonstrate compliance with the specific accreditation standard be produced in a reasonable time?
- Can the program of study deliver graduates with the knowledge, skills and professional attributes essential for an accredited program not having satisfied that specific accreditation standard?

Section 1.3 of the procedures document advise that for a new program the accreditation outcome may be either accreditation with conditions or not accredited/accreditation refused.

Section 1.4 of the procedures state:

“Accreditation of a new program of study will always have conditions in place, as the program will only be able to substantially meet the specific accreditation standards on commencement. The required evidence to meet the specific accreditation standards can only be provided through demonstration of outcomes as students’ progress through the program, and completed evaluations have been reported.”

Prior to 1 July 2019, ANZPAC published a listed of accredited programs on its website and indicated which programs are accredited with conditions. This is no longer the case under the Committee.

No information is available regarding conditions that have been imposed by ANZPAC or the Podiatry Accreditation Committee to determine if they are input or outcome focused.

Australian Dental Council

The Australian Dental Council (ADC) advises in section 5.1 of the *ADC/DC(NZ) guidelines for accreditation of education and training programs for dental practitioners* September 2018 that the outcome of accreditation may be accreditation with conditions.

The ADC advises that:

“Accreditation with conditions indicates that the program substantially meets the Accreditation Standards but the program has a deficiency or weakness in one or more Standard. The deficiency or weakness is considered to be of such a nature that it can be corrected within a reasonable period of time.”

In section 12.4 of the guidelines, the ADC provides a definition of a condition which states:

“Conditions may be imposed on a program if a standard is substantially met and the imposition of conditions will ensure full compliance with the standard within a reasonable timeframe.”

The ADC also provides a definition for when an accreditation standard is substantially met as follows:

“An Accreditation Standard is substantially met if the plans and/or arrangements in place for the provision of the program do not fully meet the Standard. A finding of substantially met must satisfy the following two criteria:

1. The plans and/or arrangements in place that are applicable to the standard must not adversely affect student welfare, or the capacity of the education provider to deliver the program, or the learning outcomes and Professional Competencies required; and .
2. There must be a reasonable expectation that the program will be able to meet the Accreditation Standard in full within a defined timeframe that does not pose an unacceptable risk.”

The *ADC Guidelines on accreditation report writing for Site Evaluation Teams* November 2018 provides further guidance to assessors as to when a condition should be used, points to consider when writing conditions and also advise when a ‘monitoring requirement’ or ‘quality improvement recommendation’ may be used instead of a condition.

The ADC publishes a listed of accredited programs on its website indicating which programs are accredited with conditions.

New programs are not automatically subject to conditions. Conditions are imposed as a result of a deficiency against one or more of the approved accreditation standards.

The ADC publishes summary accreditation reports, which include any conditions imposed. The ADC does not publish conditions imposed as a result of monitoring of accredited programs, unless a site visit or assessment of a major change has been undertaken.

Australian Medical Council

The Australian Medical Council (AMC) publishes *Procedures for Assessment and Accreditation of Medical Schools by the Australian Medical Council 2019* and *Procedures for Assessment and Accreditation of Specialist Medical Programs and Professional Development Programs 2019* which state that the AMC may grant accreditation if the program of study and the education provider *substantially* meet the accreditation standards, and imposing accreditation conditions will lead to the program meeting the standards within a reasonable time.

The AMC publishes a list of accredited providers, however doesn’t indicate which accredited programs or providers have met conditions previously imposed.

The AMC publishes the full accreditation report for all assessments undertaken, which includes the full accreditation decision.

Based on a review of the 23 accreditation reports published on the AMC’s website detailing the assessment of primary medical education programs, each program had at least one condition of accreditation.

A review of the accreditation reports for the 16 specialist medical colleges indicates that all programs and education providers are subject to conditions.

A mix of input and outcome focused conditions are used by the AMC in addressing the conditions of accreditation.

Australian Nursing and Midwifery Accreditation Council

The Australian Nursing and Midwifery Accreditation Council (ANMAC) states in the *National Accreditation Guidelines: Nursing and Midwifery Education Programs* January 2019 that:

“Accreditation with conditions is recommended when a program substantially meets the accreditation standards and the imposition of conditions ensures the program meets the accreditation standards within a reasonable timeframe.

If the conditions are not met within the reasonable timeframe, ANMAC reviews the education provider’s accreditation status to determine if it should be revoked.”

ANMAC advises the NMBA of the conditions have been applied. The Approved Program of Study list notes that the program is subject to ANMAC conditions but does not provide details.

Conditions that have been imposed by ANMAC can be input or outcome focused depending on the nature of the non-compliance with specific accreditation criteria.

Australian Pharmacy Council

The Australian Pharmacy Council (APC) advises in the *Australian/New Zealand Pharmacy Degree Programs Handbook* (no date provided) that the APC may accredit a program of study with or without conditions. The APC defines Accredited with Conditions as:

“The pharmacy degree program substantially meets the standards and can fully meet the standards within a reasonable period of time.”

The Handbook goes on to state that Schools that have monitoring requirements or conditions placed on their accreditation must respond within the timeframes outlined. The Handbook advised that the timeframes align to periods of three, six or twelve month periods depending on the requirement of the condition.

There was no indication in the documentation publically available that all programs are subject to conditions.

A list of programs accredited and indicating which programs are subject to conditions is available on the APC website.

No information is available regarding the conditions applied to programs accredited by the APC.

Australian Physiotherapy Council

The Australian Physiotherapy Council’s (APhysioC) *Guidelines for Accreditation – Entry-level Physiotherapy Practitioner Programs of Study* (2017) provides an explanation as to why conditions are applied to accredited programs, taken directly from section 48 1(b) of the National Law.

Page 20 of the guidelines provide the following definition of a condition:

“Condition - a mandatory reporting obligation imposed on an accredited program to be addressed in a set time frame to enable a criterion of accreditation to be met.”

APhysioC advises in section 1.4 of the guidelines document that for a new program the accreditation outcome may be either accreditation with conditions or not accredited.

No information is published regarding whether a program is subject to conditions of accreditation.

No information is available regarding the conditions applied to programs accredited by the APhysioC.

Australian Psychology Accreditation Council

The Australian Psychology Accreditation Council (APAC) publishes the *APAC Rules for Accreditation* (Effective 1 January 2019), which provides a definition of accredited with conditions as follows:

“APAC has determined that a program substantially meets the relevant Standards and the imposition of conditions on accreditation will ensure the program meets the Standards within a reasonable time, consistent with Section 48 of the National Law.”

A list of programs accredited and indicating which programs are subject to conditions is available on the APAC website. The APAC website states:

“Accredited with Conditions means that APAC has determined that a program meets most of the applicable Standards, and those not met at the time of assessment are likely to be met within the time specified by APAC. A determination of Accreditation with Conditions will be accompanied by a list of matters to be addressed and a date by which those matters must be addressed.”

A summary report of the assessment is published for each accreditation review, however conditions imposed on programs and providers are not made public.

Chinese Medicine Accreditation Committee

The Chinese Medicine Accreditation Committee publishes the *Chinese Medicine accreditation process* February 2017 on the Board’s website. Under section 10.4 it states:

“The Accreditation Committee may decide to impose conditions on the initial accreditation of a program if the final accreditation report indicates:

- a) the education provider and program substantially meet the accreditation standards, and
- b) the imposition of conditions will ensure all accreditation standards are met within a reasonable time.”

There is no indication in the process that a program seeking initial accreditation is automatically subject to conditions.

Section 11.3 advises of the requirement of education providers to respond to conditions and provides a list of the types of responses the committee may require including:

- a) written submissions
- b) site visits
- c) meetings with groups or individuals, including with representatives of the education provider, or
- d) any other type of report the committee considers appropriate in the circumstances.

A list of programs accredited by the Committee is published under the 'Accredited programs' section of the Board's accreditation website. The listing identifies those programs which have had a condition imposed.

No information is available regarding the conditions that have been imposed by the Committee to determine if they are input or outcome focused.

Council on Chiropractic Education Australasia

The Council on Chiropractic Education Australasia (CCEA) publishes the *Accreditation Guidelines for Chiropractic Education Programs* January 2018. The guidelines advise that the CCEA may make a determination regarding a new program as either accreditation with conditions or accreditation denied.

Accreditation with conditions for a new program is described as:

"Accreditation as a new program is granted with conditions for a period of up to three years, subject to conditions being addressed within a specified time and depending on satisfactory reports (either annual or as otherwise specified). Conditions may relate to the progressive implementation of the new program and the provision of adequate staffing and facilities to support the developing program."

Although there is a clear statement that accreditation may be granted with conditions, there is no indication as to why a condition may be imposed on a program.

A list of accredited programs is published on the CCEA website, however there is no indication as to which programs are accredited with conditions. The guidelines advise that a chiropractic program accredited with conditions by the CCEA may make a public statement that the program is accredited with conditions by the CCEA, however no statements on education providers websites were identified for the four accredited Australian programs.

No information is available regarding the conditions that have been imposed to determine if they are input or outcome focused.

Medical Radiation Practice Accreditation Committee

The Medical Radiation Practice Accreditation Committee publishes the *Medical Radiation Practice accreditation process* February 2017 on the Board's website. Under section 10.4 it states:

"The Accreditation Committee may decide to impose conditions on the initial accreditation of a program if the final accreditation report indicates:

- a) the education provider and program substantially meet the accreditation standards, and
- b) the imposition of conditions will ensure all accreditation standards are met within a reasonable time."

There is no indication in the process that a program seeking initial accreditation is automatically subject to conditions.

Section 11.3 advises of the requirement of education providers to respond to conditions and provides a list of the types of responses the committee may require including:

- a) written submissions
- b) site visits

- c) meetings with groups or individuals, including with representatives of the education provider, or
- d) any other type of report the committee considers appropriate in the circumstances.

A list of programs accredited by the Committee is published under the 'Accredited programs' section of the Board's accreditation website. The listing identifies those programs which have had a condition imposed.

No information is available regarding the conditions that have been imposed by the Committee to determine if they are input or outcome focused.

Occupational Therapy Council of Australia Ltd

The Occupational Therapy Council (OTC) Australia Ltd publishes the *Accreditation of Entry-Level Occupational Therapy Education Programs - Guidelines for Education Providers* July 2018 which state:

"The OTC may also grant accreditation if it is reasonably satisfied the program of study and the education provider substantially meet approved accreditation standards, and the imposition of conditions on the approval will ensure the program meets the accreditation standards within a reasonable time."

The Guidelines explain that all new programs seeking accreditation will be accredited with conditions.

A list of programs accredited and indicating which programs are subject to conditions is available on the OTC website.

No information is available regarding the conditions applied to programs accredited by the OTC.

Optometry Council of Australia and New Zealand

The Optometry Council of Australia and New Zealand (OCANZ) publishes the *Accreditation Manual for Optometry Programs in Australia and New Zealand Part 1 – Process and Procedures* August 2012 which advises that for programs being assessed for reaccreditation, that accreditation with conditions may be granted when one or more standards are not fully met, provided the school is capable of rectifying any shortcomings within a specified period.

The manual also advises in section 2.4.4 that accreditation with conditions may be granted to a new program, with the primary condition to stay in place until the first cohort of students completes the program.

A list of programs accredited by OCANZ and indicating which are subject to conditions is available on the website.

The OCANZ website clearly states the conditions relating to an accredited program and details are also provided of when a condition is deemed to have been met with updates to condition published in the executive summary available from the website.

Based on a preliminary review of the conditions as published on the OCANZ website, there is a focus on the evidence required to demonstrate that an accreditation standard is met, without prescribing how the outcome is achieved.

A common approach to conditions

The *High Level Accreditation Principles* agreed by the then Health Professions Accreditation Council's Forum in June 2016 states:

"In a "right-touch" approach, we will use a risk-based approach to our accreditation work. This includes using conditions and monitoring within the framework provided in the National Law, and applying these in a consistent and best-practice way."

The High Level Principles go on to state that the Forum recognises the importance of a complementary approach, with standards and processes focused on outcomes to enable innovation in education.

Following the review of how conditions are used across the Scheme, consideration must be given to how a greater commonality could be achieved taking into consideration the varying way that conditions are used.

The *Quality Framework for the Accreditation Function* (August 2018) as agreed between APHRA, accreditation authorities and national boards requires that accreditation authorities apply the approved accreditation standards and have rigorous, fair and consistent processes for accrediting programs of study and their education providers.

Prescribing an approach to meet all needs may not establish the change desired.

Instead, guiding principles for the use of conditions have been developed to improve consistency and transparency across the Scheme. It is intended that the way in which each authority uses the guiding principles could vary.

The guiding principles as proposed aim to ensure consistency with the following reference documents:

- Joint Statement of Principles for Professional Accreditation, Universities Australia and Professions Australia, March 2016
- Quality Framework for the Accreditation Function, August 2018
- Council of Australian Governments, Best Practice Regulation – A Guide for Ministerial Councils and National Standard Setting Bodies, October 2007.

Guiding principles for assessors and accreditation authorities

- Guiding principle 1 – The purpose of a condition is to address a shortfall against an approved Accreditation Standard
- Guiding principle 2 – The timeframe by which a condition must be met is to be fair and reasonable.
- Guiding principle 3 – The condition should relate to the desired outcome.
- Guiding principle 4 – A condition must be clear.

Next steps

The guiding principles can be used in a variety of ways, and it is for each decision making entity to decide if and how they may be useful in developing accreditation conditions.

As an example, the ADC has created guidance for assessors in writing conditions. The ADC's *Writing accreditation conditions - Guiding principles for assessors* is one example of how the guiding principles can provide instruction to assessors to improve consistency in the use of conditions.

There are likely to be benefits associated with accreditation authorities consistently applying these guiding principles as a minimum. There may be additional principles, or unique circumstances that accreditation authorities might apply. It is for the each entity to determine how such principles may apply and be of benefit.

Another opportunity for consideration is whether there is capacity to share the outcome of accreditation decisions, including conditions between accreditation authorities. The aim would be to increase consistency of decision making between accreditation bodies and look to improve the way that conditions are applied to programs with the NRAS.

Currently, only three accreditation authorities publish conditions of accreditation publicly. The limited information available makes it difficult to determine where there is consistency in approach and provide opportunities to learn from the effectiveness of the use of conditions to address areas of concern.

The other area that may be considered is how accreditation authorities communicate what a condition is and why a condition is necessary. Improving the understanding of what a condition aims to achieve and why they are imposed may improve the broader sectors understanding of the importance of accreditation in ensuring health practitioners graduating from accredited and approved programs are safe and competent to practise.