



Australian Council of Deans of Health Sciences submission regarding the AHPRA Review of accreditation arrangements- assignment of accreditation functions.

The Australian Council of Deans of Health Sciences (ACDHS) welcomes the opportunity to provide comment on the AHPRA Review of accreditation arrangements- assignment of accreditation functions. ACDHS is the peak representative body of the Australian universities that provide pre-professional education in the allied health sciences. The Council adopts a whole of health system perspective and considers the development of an innovative and sustainable health workforce will best position Australia to address present and emerging health care demands.

ACDHS member universities include:

Central Queensland University	Monash University
Charles Sturt University	Queensland University of Technology
Curtin University	University of Canberra
Deakin University	University of Newcastle
Flinders University	University of Queensland
Griffith University	University of South Australia
James Cook University	University of Sydney
La Trobe University	Western Sydney University

While it is noted that many of our members teach a broader range of health programs, the following professions fall within the remit of our Council:

Clinical exercise physiology/sport and exercise science	Pharmacy
Medical laboratory science	Physiotherapy
Nutrition and dietetics	Podiatry
Occupational therapy	Prosthetics and orthotics
Optometry	Medical radiation science
Orthoptics	Speech pathology

Comments from the Australian Council of Deans of Health Sciences (ACDHS) therefore cover a number of the professions of allied health regulated by AHPRA. Health program accreditation is an issue of prime importance to ACDHS members. Key messages in submissions to recent reviews of accreditation systems¹ include support for initiatives that decrease duplication between accreditation processes and reduce the administrative burden on universities.

The requirement for a significant transition time for any implementation of recommendations arising from recent reports is noted (p8/42) along with the anticipated continuance of accreditation functions by the current authorities. It is noted that the AHPRA review of accreditation arrangements- assignment of accreditation functions has a narrower focus and scope than the broad ranging reviews recently undertaken.

¹ 2016 Department of Education and Training (DET) commissioned *Mapping of professional accreditation in the context higher education regulatory and standards frameworks* and 2017 *Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions*

The key themes identified in recent reports noted on p9/42 of the Consultation Paper broadly reflect the perspectives of ACDHS members ie:

- the potential to reduce duplication, regulatory burden and cost
- the need for greater transparency and accountability including in relation to cost, fees and performance
- the opportunity for greater collaboration, sharing of good practice and multi-profession approaches including to address health workforce issues and achieve greater effectiveness, and
- the need for clearer performance indicators to more effectively address these issues and other key measures of performance.

ACDHS strongly recommends the development of consistent and comprehensive training for members of accreditation assessment teams including but not limited to:

- Training for assessors on the scope nature of the assessment
- Some training on different modes and delivery of teaching and learning.
- An understanding of input versus outputs and outcomes
- Appreciation of innovation and understanding that innovation does have risks but may be acceptable as long as risks can be mitigated
- Education from a peak health consumer organisation representatives
- Establish a process of auditing a sample of assessments

ACDHS also welcomes initiatives to increase the consistency and commonality between standards to decrease the administrative burden on universities, including

- Standardisation of format would be more efficient and a welcome improvement
- Consistency of definitions for key terms amongst accrediting bodies and higher education institutions.

Adoption of risk based approaches requires incisive understanding and description of what constitutes or flags a risk within the accreditation system and how much system penetration is required to identify false positives. Unless both are clearly described, there is a significant risk of delayed identification of problems that may occurring in a higher education provider's program. Specific areas that require monitoring are

- transition between versions of standards
- detail that may be contained in accompanying guidance documents rather than the standards
- rationale and costs for annual reporting
- level of detail required by some accreditation authorities
 - eg tracking and reporting all clinical education placements of each student
- appropriate panel education report back by exception

Additionally, ACDHS members assert there should be a formal appeal process where all matters are dealt with in a transparent manner by an independent arbiter.

Thank you once again for the opportunity to provide comment

