

Australian Health Practitioner Regulation Agency (AHPRA)

Review of accreditation arrangements – assignment of accreditation functions

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The Australian Psychological Society (APS) welcomes the opportunity to provide feedback to the Australian Health Practitioner Regulation Agency (AHPRA) on their Consultation Paper: *Review of accreditation arrangements – assignment of accreditation functions*. The APS is the largest professional organisation for psychologists in Australia representing approximately 24,000 members.

The responses to the consultation questions are informed by the APS experience with the Australian Psychology Accreditation Council (APAC) as the external accreditation body for psychology.

Response to consultation questions

1. What is your general experience of the accreditation functions under the National Law?

The APS is generally pleased with the performance of APAC in terms of carrying out the accreditation functions specified under the National Law.

2. Comments on performance against the individual Quality Framework domains:

Governance

The APS contends that APAC is delivering competent and professional governance arrangements. The APAC governing body is large by comparison to other accreditation bodies but this allows for a genuine balance of interests between the professional body, the education providers, and the Psychology Board of Australia. It also ensures a high level of community input, and in keeping with good governance, community appointees bring expertise in key areas such as law, business and finance.

APAC gives priority to its accreditation function. It currently does not assess accrediting authorities in other countries or overseas qualified psychologists; however, the APS would strongly support these functions being moved from the Psychology Board of Australia to APAC. APAC has the skills, and knowledge to undertake such a task. It has been asked in the past to undertake such tasks. Such tasks do not fit with a Registration function.

Independence

The APS notes the requirement under the Quality Framework that accreditation authorities must have independent decision-making structures and processes and a balance of interests. As an external accreditation body, APAC has proactively sought to ensure that they comply with this domain of the Framework by revising their governance arrangements to address the *perception* of non-independent decision-making. The new APAC governance structure provides for a balance of stakeholder and community input that supports independent decision-making. These significant actions by APAC indicate the effectiveness of the Quality Framework in driving good practice and the willingness of APAC to ensure they comply with the National Law.

Operational management

The number and complexity of psychology programs places considerable demand on APAC in terms of human and financial resources. The APS believes that these resources are well managed, and APAC appropriately includes a wide range of well trained and supported academics and members of the profession on program assessment committees and site visits.

Accreditation standards

APAC adopted an outcome-based approach to the development of their new accreditation standards (effective January 2019). The development of the standards commenced in 2012 and was not completed until August 2017. While APAC undertook extensive and lengthy consultation with stakeholders, especially higher education providers and the profession, the delay in finalising the standards was due to repeated requests for revision by the Psychology Board of Australia, each time requiring further national consultation. The delay in delivering these important standards was of great concern to the APS, interfering with innovation and flexible responses to workforce needs and impacting on practitioner currency of practice. The unreasonable delay reflects the importance of separating the responsibility for the regulation of accreditation functions from the regulation of individual practitioners.

The new standards represent a substantive change for the profession and while facilitating greater flexibility and responsiveness, there remains concern among some higher education providers that there may need to be more input or process-based elements in order to ensure program quality.

Processes for accreditation of programs of study and education providers

The APS has no concerns with the processes employed by APAC to accredit program of study and education providers. These processes seem to be reasonable and robust. From 2019 all programs will follow the new APAC standards. Existing programs due to be reassessed during 2019 for the 5 year cycle review will need to also adhere to the new APAC standards. During 2018 APAC will be holding public information sessions in five major cities outlining the process to develop the new standards, outlining the major changes in the standards and the impact of these changes for the APAC accreditation process. APAC has also developed an evidence guide to assist higher education providers with preparing evidence to demonstrate how their programs comply with meeting the standards.

APAC will ensure all trainers are appropriately trained. The assessment teams will examine evidence of meeting the standards during the accreditation process which includes site visits, in-depth consultations with key stakeholders (students, staff, supervisors, placement providers, graduates and employers) and external stakeholders such as TEQSA, PsyBA, etc. An area for potential improvement is to provide HEPs with clear information about the assessors. Nevertheless, HEPs have the option to request that a particular assessor be withdrawn, providing that a sound rationale is put forward.

Assessing authorities in other countries

The role of assessing registration as a psychologist in Australia is undertaken by the Psychology Board of Australia. The Australian Psychological Society is the government-

approved national assessing authority for migration. The Australian Psychological Society conducts assessments for prospective postgraduate students to enrol in an accredited postgraduate program. Relates to the points above.

Assessing overseas qualified practitioners

This role is currently undertaken by the Psychology Board of Australia. The APS support this role being transferred to APAC. Relates to the points above. Note that the PsyBA has a voice on the APAC Board.

Stakeholder collaboration

The structure of the governing body of APAC ensures a balance of stakeholder input to decision-making (higher education providers, profession, Psychology Board of Australia, community members). A number of members of the profession and academics are also engaged in various ways within APAC and consultation for the development of the new standards was extensive.

3. Do you have any comments on how future accreditation agreements could address any of the following issues and demonstrate progressive improvements over the next five years:

- *Reducing duplication, regulatory burden and costs*

Many higher education providers in psychology are concerned about the duplication, regulatory burden and costs associated with complying with the requirements of the different regulatory agencies, specifically APAC and Tertiary Quality Standards Agency (TEQSA). There is considerable value in the TEQSA assessment criteria and principles taken as assessed in APAC standards to reduce this administrative and financial burden. Commonality in these assessment standards should also reduce costs for higher education providers (and indirectly students).

- *Increasing transparency and accountability including in relation to cost, fees and performance*

APAC ensures transparency and accountability by publicly outlining the accreditation process on the APAC webpage, engaging with key stakeholders during the accreditation process through extensive discussions and consultations, publishing the fee schedule on the APAC web page and clearly indicating that the cost is contingent on a number of factors, and finally maintaining a publicly available list of all current APAC-approved programs of study. APAC also publishes the summaries of outcomes of each cycle accreditation it conducts.

- *Achieving greater collaboration, sharing of good practice and multi-profession approaches including to address health workforce issues and achieve greater effectiveness*

Health workforce issues need to be given greater consideration through collaboration with the profession which understands the details and issues facing the workforce. The Health Professionals Accreditation Collaboration Forum (HPACF) provides the appropriate venue for joint projects by the various health professional accrediting bodies and hence a mechanism for collaboration, sharing of good practice and multi-

profession approaches. Given the potential for accreditation functions to leverage widespread workforce change, this forum should be supported to extend this important collaborative work; of particular interest is the current project focusing on using accreditation approaches to improve Aboriginal and Torres Strait Islander health that has the potential to achieve significant outcomes. Similar opportunities to address workforce issues could be supported through this collaborative pathway.

- *Establishing clearer performance indicators to more effectively address these issues and other key measures of performance.*

APAC has recently reviewed and redeveloped the standards for the education and training of psychologists. The National Law requires APAC to have a system of cyclical review and monitoring of programs delivered through higher education providers. APAC accomplishes this through routine and targeted methods.

4. Do you have any comments on the extent to which accreditation has addressed or had regard for the objectives and guiding principles of the National Scheme?

The APS contends that APAC has ensured that the accreditation of psychology programs has generally been in alignment with the objectives and guiding principles of the National Scheme.

The APS believes that the lengthy delay in developing and implementing the new psychology standards has impacted on “the continuous development of a flexible, responsive and sustainable Australian health workforce [psychologists] and to enable innovation in the education of, and service delivery by, health practitioners [psychologists]”. There have been increasing challenges associated with the previous standards not aligning with workforce needs, yet the repeated requests for revisions to the new standards by the Psychology Board of Australia, despite exhaustive consultation by APAC, has meant the profession has been inflexible and slow to adapt to community and workforce needs. This reflects the unsatisfactory failure to separate accreditation of education from regulation of practitioners under the National Law.

5. Do you have any comments on how future accreditation arrangements could address or have regard for the objectives and guiding principles of the National Scheme?

APAC will be implementing the new Standards from 1 January 2019. An adequate time frame is required in order to appropriately assess how the new approach to accreditation in psychology is progressing. It is important that the new system is given ample time to be implemented and assessed before discussion of how future accreditation arrangements could be different or managed differently.

6. Do you have any comments on the benefits or risks of an arrangement where one accreditation authority performs accreditation functions for more than one profession?

The APS believes there are significant risks associated with the proposal that one accreditation authority perform accreditation functions for multiple professions including psychology. Table 6 in the Consultation Paper highlights the exceedingly high

number of programs currently assessed by APAC compared to other health professions. APAC accredits over 900 programs (including undergraduate programs that are part of the pathway to psychologist registration). This intense workload and high level skills and knowledge that exist within APAC are unlikely to be successfully transferred to another authority.

It is also difficult to see how one accreditation authority could be responsible for developing standards for the education and training of psychologists in addition to responsibilities for the accreditation of one or more other professions. Training to be a psychologist requires initial training in the discipline of psychology followed by training in the practice of psychology. Undergraduate programs in psychology focus on the discipline of psychology which is part of a pathway to registration (and thus subject to accreditation) but the practice of psychology (i.e., patient care) does not become the focal point of training till the post-graduate stage. Thus, large numbers of students complete an accredited psychology undergraduate program but do not go on to become a registered psychologist. This is very different to the approach adopted for the training of other health professionals who do not have to complete initial training in a discipline prior to training in the practice. The APS believes it would be very difficult to combine psychology accreditation with other professions because of the unique nature of the pathway for training to become a psychologist and hence the unique nature of the psychology curriculum. Such a move is likely to impact negatively on the overall quality of standards and the assessment of psychology programs.

Finally, in the case of psychology, given that APAC has consistently delivered quality performance, it is difficult to see what benefits could accrue in terms of ensuring the public have access to well trained, competent psychologists by shifting to a single accrediting authority. Accreditation should be undertaken by profession-specific accreditation bodies.

7. Do you have any other comments about the future accreditation arrangements in the National Scheme?

While the APS understands the need for improved efficiency of the accreditation system, it is vital that this not become the sole focus of reform in the sector. In terms of quality outcomes, APAC has consistently prioritised quality in their governance, operational management, accreditation standards and processes and delivers on the objective of facilitating the provision of high quality education and training so that psychologists are able to practice in a competent and ethical manner. As noted above, Table 6 in the Consultation Paper highlights the high number of programs assessed by APAC compared to other health professions. Such profession-specific expertise and high quality, well developed systems should not be lost as a result of a quest for greater efficiencies.

The APS reiterates the importance of separating the accreditation of education and training programs from the accreditation of individual practitioners. As previously discussed, the extensive delays in the approval of psychology standards since National Law required approval by the Psychology Board of Australia, the profession has waited 7 years from commencement of the development of standards (2012) to their implementation (2019). This has resulted in stifling of innovation and flexibility in psychology training, and effectively undermined rather than enhanced psychology workforce development.