

Communication between Accreditation Authorities and National Boards about accreditation and program approval decisions and changes to accreditation standards – a guidance document about good practice

Executive summary

The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) gives separate but related accreditation roles to Accreditation Authorities and National Boards, and requires communication between Accreditation Authorities and their National Boards when certain decisions are made or required.

This paper provides guidance on what Accreditation Authorities should report to National Boards to enable the Boards to discharge their separate role and how Boards and Accreditation Authorities can work collaboratively to facilitate good decision-making.

It begins with a description of accreditation as a form of program evaluation in which the quality of an education program is judged against defined accreditation standards through a combination of self-assessment and external peer review. It describes the purpose of the accreditation report for the accreditation authority, for the education provider being reviewed, and for the National Board.

It provides a set of guiding principles for Accreditation Authorities and National Boards on: (i) matters to address in reporting an accreditation decision, and (ii) reporting on new or revised accreditation standards outlining for each the *requirements*, the *operating procedures*, and the *guiding principles*. In reporting an accreditation decision, the *requirements*, *operating procedures* and *guiding principles* are outlined for each of the following:

1. the report from the Accreditation Authority to the National Board
2. the wording of the accreditation decision
3. other information on the accredited program and the education provider that should be covered in the report to the National Board, and
4. the National Board response to the Accreditation Authority's report.

This guidance is about routine reporting, not that required in exceptional circumstances. The word 'must' is used to indicate an expectation of a process. The word 'should' is used to indicate good practice and a level of discretion.

1. Background and purpose

Background

Accreditation is a form of program evaluation in which the quality of an education program is judged against defined accreditation standards through a combination of self-assessment and external peer

Note: nothing in this document is intended to create legal obligations.

review. Accreditation of programs ensures that the education and training leading to registration as a health practitioner is rigorous and prepares the graduates to practise the health profession safely.

The accreditation process usually starts with a self-assessment by the education provider. As well as being a planning tool for the education provider, this process helps develop the submission that describes and analyses the program and the education provider against the accreditation standards. Accreditation authorities gather information and evidence about the program and provider being accredited through this submission and other means. They consider and validate the information through methods such as stakeholder consultation (e.g. surveys and interviews), observation of teaching and assessment activities, and site visits, and make an assessment against the accreditation standards.

They prepare an accreditation report on their findings, which will state whether the accreditation standards are met and recommend actions if they are not, and give a brief account of the evidence supporting the findings. The report will state the accreditation recommendations or accreditation decision, including a period of accreditation (where applicable).

The accreditation report may serve a couple of purposes. As well as assisting the accreditation authority to reach an accreditation decision, it may also provide feedback to the education provider to help improve the quality of the program and to acknowledge strengths of the program.

The National Law requires that accreditation authorities also give a report on their accreditation of a program to their National Board. This report informs the Board's decision making on approval of the accredited program for the purposes of registration.

Purpose

The accreditation provisions of the National Law separate 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 determine whether to approve the accreditation standards and whether to approve the accredited programs as providing a qualification for the purposes of registration or endorsement in the health profession.

This paper provides guidance on what Accreditation Authorities should report to National Boards to enable the Boards to discharge their separate role and how Boards and Accreditation Authorities can work collaboratively to ensure good decision making and clear reporting about programs of study and their education providers.

It does not propose standardised reporting formats or templates, but rather a set of guiding principles for Accreditation Authorities and National Boards on the essential and desirable matters to address when Accreditation Authorities report on accreditation decisions made and on accreditation standards developed.

This guidance is about routine reporting. In exceptional circumstances, such as where a report to a National Board identifies serious concerns, additional communication between the Accreditation Authority and the National Board would be required.

Accreditation Authorities report to National Boards on the accreditation of specific programs and providers within an established and defined relationship and reporting framework. The document, *Accreditation under the Health Practitioner Regulation National Law Act (June 2011)*, contains the jointly agreed statement between the National Boards and the Accreditation Authorities exercising the functions at the time about the operation of accreditation under the National Law and the National Quality Framework for Accreditation. Each Accreditation Authority reports regularly to the relevant National Board against the domains of the quality framework. This regular reporting, as well as the periodic review of Accreditation Authorities' performance, provides a basis for National Boards to have confidence in the Accreditation Authority's performance of the accreditation functions. This

includes confidence in the integrity of the accreditation decision making processes of the Accreditation Authority, sufficient to warrant assignment of the accreditation function to the Authority under the National Law.

In the sections that follow, the word “must” is used to indicate an expectation of a process. The word “should” is used to indicate good practice and a level of discretion.

2. Matters to address in reporting an accreditation decision

2.1 *The report from the Accreditation Authority to the National Board*

Requirements

The National Law defines **accreditation standard** for a health profession as a standard used to assess whether a program of study, and the education provider that provides the program of study, provide persons who complete the program with the knowledge, skills and professional attributes necessary to practise the profession in Australia.

Under Section 48(2) of the National Law, if an Accreditation Authority decides to accredit a program it must give the National Board a report about the Authority’s accreditation of the program.

Under Section 49 (1) if a National Board is given a report by an Accreditation Authority about the Authority’s accreditation of a program, the Board may approve, or refuse to approve, the accredited program of study as providing a qualification for the purposes of registration in the health profession for which the Board is established.

Operating procedures

The form of the report by Accreditation Authorities to their National Boards varies. It might be an Accreditation Authority’s accreditation report, or a letter and a report specifically prepared for the National Board. This is a matter for negotiation between each Accreditation Authority and relevant National Board.

The way in which the Accreditation Authority organises its report on the assessment of the program against the accreditation standards will depend on the structure and content of the standards for the profession.

The National Law does not require the Accreditation Authority to report to the National Board about programs of study which it has not accredited. While Accreditation Authorities are encouraged to report on these matters, the principles that follow relate to reports on decisions to accredit a program.

Guiding principles

The National Board does not make the accreditation decision, that is, it does not assess the evidence and decide if the program and provider meet or substantially meet the accreditation standards. It does however use the Accreditation Authority’s report on the accreditation to make a decision on approval of the accredited program. To support the National Board in making the decision to approve or refuse to approve the accredited program as providing a qualification for the purposes of registration, the Accreditation Authority’s report:

1. *Must* confirm that the Accreditation Authority has made and is reporting on an accreditation decision
2. *Must* provide information that demonstrates the Accreditation Authority has made a proper accreditation decision under the National Law. For example, the Accreditation Authority might outline the following matters about its assessment of the program:
 - the reason an accreditation decision needed to be made (e.g. accreditation expiring, major change to accredited program);
 - the type of accreditation assessment undertaken;

- the body/committee of the Accreditation Authority that made the accreditation decision and the date the decision was made;
 - if relevant, the outcome of any review of the process or decision completed by the Accreditation Authority at the request of the education provider
3. *Should* provide brief contextual information, such as a description of the program and the provider's accreditation history.

2.2 *Wording of the accreditation decision*

Requirements

Under Section 48 of the National Law an Accreditation Authority can accredit a program of study if it is reasonably satisfied that:

- the program of study, and the education provider that provides the program of study, meet an approved accreditation standard for the profession; or
- 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.

Section 50 [1] of the National Law requires the Accreditation Authority to monitor accredited programs to ensure the Authority continues to be satisfied the program and provider meet an approved accreditation standard.

The objectives of the National Registration and Accreditation Scheme include facilitating the provision of high quality education and training of health practitioners and enabling innovation in the education of health practitioners.

Operating procedures

An Accreditation Authority makes an accreditation decision taking account of the information it has gathered through its accreditation process and its analysis of that information. It will also consider the context and circumstances of the program and the education provider. The context and circumstances might include the accreditation history of the program, whether the program is new or well established, the capacity of the provider to address any issues raised in the accreditation assessment including the resources available to the program and the provider, and whether any issues are long standing or new.

An Accreditation Authority will also take account of context and circumstance in setting conditions. Similarly, what is a reasonable timeframe to meet a specific accreditation standard may vary from program to program and provider to provider depending on the context, the number of conditions imposed and the nature of the conditions.

Accreditation Authorities, where the Authority specifies a time period, give longer periods of accreditation for programs and providers which are generally satisfactory than to those which have numerous conditions, are under development or are undergoing major change.

Consistent with the objectives of the National Registration and Accreditation Scheme, Accreditation Authorities may make recommendations to education providers to improve the quality of their programs and processes. These are suggestions, not conditions. Some Accreditation Authorities include the quality assurance recommendations in their accreditation reports and their reports to the National Board.

Guiding principles

The Accreditation Authority's report to the National Board must provide information about the accreditation decision on the program. The report:

1. *must* state explicitly that the Accreditation Authority is either
 - reasonably satisfied that the program of study and the provider meet the accreditation standards, or
 - reasonably satisfied that the program of study and the provider substantially meet the accreditation standards.
 2. *must* list any conditions imposed under the National Law to ensure the program meets a standard or standards, the standard(s) or criteria to which those conditions relate, the time within which the education provider is to address each condition, and provide sufficient information to explain the reasons for imposing each condition.
 3. *must* highlight any conditions placed on the accreditation as a result of serious concerns about whether the program and the education provider provide graduates with the knowledge, skills and professional attributes necessary to practise the profession in Australia.
 4. *must* state the Accreditation Authority's findings against the standards, particularly those standards only substantially met or not met. If a standard is not met, and the Accreditation Authority has granted accreditation, the report must outline the reasoning.
 5. if quality improvement recommendations are included should distinguish between them and conditions which must be satisfied to meet accreditation standards.
 6. *must* indicate how the Accreditation Authority will monitor the accredited program to ensure it continues to be satisfied the program and provider meet the approved accreditation standards. The Accreditation Authority may indicate this by referring to its standard monitoring processes.
- 2.3 *Other information on the accredited program and the education provider that should be covered in the report to the National Board*

Requirements

Section 49 (5) of the National Law requires that a list of the programs of study approved by National Boards as providing a qualification for registration in their respective health professions must be published on the Australian Health Practitioner Regulation Agency (AHPRA) website.

Operating procedures

AHPRA obtains the information to populate this database from education providers and Accreditation Authorities.

Guiding principles

Accreditation Authorities can assist National Boards in making their decisions on approval of an accredited program, and AHPRA in managing its database of approved programs and providers, by providing the following information about the accredited program.

1. Reports *should* state:
 - the length of the program in years
 - if the program of study is accredited only for some locations/campuses where it is offered
 - the stage of the program when students first undertake clinical experience or placements where they have direct contact with patients. This information is relevant for the registration of students.
2. Reports about accreditation of specialist programs *should* indicate the specialty or specialties and, if relevant, the field(s) of specialty practice covered by the program.
3. Reports about accreditation of programs of study for endorsement *should* indicate the area of practice covered by the program.

2.4 National Board response to the Accreditation Authority's report

Requirements

Section 49 of the National Law provides that if the Accreditation Authority gives the National Board a report about the Authority's accreditation of a program of study, the Board may approve or refuse to approve the accredited program of study as providing a qualification for the purposes of registration in the relevant health profession.

The Board's approval may be granted subject to the conditions the Board considers necessary or desirable in the circumstances.

Operating procedures

A National Board may require additional information from its Accreditation Authority to inform a decision to approve or not to approve an accredited program of study for the purposes of registration. Accreditation Authorities and National Boards have established processes for communicating when National Boards need additional information. In some cases, the National Board routinely invites the Accreditation Authority to present its report on an accredited program to the Board meeting.

National Boards generally have not imposed conditions on their approval of a program over and above the Accreditation Authority's conditions on the accreditation of the program, although some National Boards have done so.

In approving an accredited program of study, the National Board generally sets a date when the approval will end.

Accreditation Authorities place information in the public domain (generally their website) on accredited programs and their providers. National Boards also announce publicly (generally through communiques) decisions to approve accredited programs of study.

Guiding principles

To ensure good decision-making and clear reporting about programs of study and their education providers:

1. Accreditation Authorities and National Boards *must* be willing to share relevant information.
2. If an Accreditation Authority report and correspondence to the National Board does not appear to provide the agreed information listed earlier, AHPRA staff who support National Boards should first seek clarification or additional information from the Accreditation Authority before submitting the documentation to the National Board.
3. National Boards should consider inviting representatives of the Accreditation Authority to attend the Board meeting to present the report and answer any questions.

In making a decision to approve an accredited program, the National Board:

- *should* normally set an expiry date that aligns with the expiry of the period of accreditation (where applicable).
- *should* not need to impose any conditions on its approval of an accredited program of study. In most cases, the imposition of conditions by the Accreditation Authority, the Authority's monitoring of those conditions and reporting to the Board, and the other powers available under the National Law should adequately manage the risks that the accreditation standards will not be met.

In public communications about the decision to approve an accredited program of study, if a National Board wishes to highlight that a program does not yet meet all the accreditation standards, the information on the Board's website could advise that the accreditation of the program is subject to

conditions. There could be a link to information on the AHPRA website explaining accreditation with conditions and what happens if an Accreditation Authority revokes its accreditation of an approved program of study (the National Law provides that the Board's approval of the program of study is automatically cancelled).

3. Reporting on new or revised accreditation standards

Requirements

Under Section 46 of the National Law, Accreditation Authorities develop accreditation standards and in doing so they must undertake wide-ranging consultation about the content of the standard.

Under Section 47, as soon as practicable after it receives an accreditation standard, the National Board must decide to approve or refuse to approve the accreditation standard or ask the Accreditation Authority to review the standard.

Under Section 47(7) an accreditation standard takes effect:

- (a) on the day it is published on the National Board's website; or
- (b) if a later day is stated in the standard, on that day.

Operating procedures

In consultation with the Accreditation Authorities, AHPRA has developed *Procedures for the Development of Accreditation Standards*. These give detailed guidance on the matters Accreditation Authorities must consider in proposing a new or amended accreditation standard, describe the wide ranging consultation required, and outline the assessment expected of the proposed standards against COAG principles for best practice regulation.

Guiding principles

In proposing a new or amended accreditation standard in addition to following the *Procedures for the Development of Accreditation Standards*, the Accreditation Authority:

1. *must* indicate that it is seeking the National Board's approval of new or reviewed accreditation standards under section 46 and 47 of the National Law.
2. *must*, for revised accreditation standards, describe the nature of the changes made and the rationale for these changes.
3. *must*, for new accreditation standards, describe the rationale for developing the new standards.
4. *must* confirm that it undertook a wide ranging consultation process.
5. *must* indicate how the Authority has addressed the Procedures for the Development of Accreditation Standards. The Accreditation Authority might:
 - provide a narrative on how the standards take into account the objectives and guiding principles of the National Law and the COAG principles for best practice regulation
 - describe its wide ranging consultation process;
 - provide an overview of the feedback from stakeholders obtained during consultation, and how this feedback has been addressed in the standards (or if it has not, broadly why not)
6. *must* indicate when the Authority recommends the standards take effect and, if not immediately from the date of the National Board's decision to approve the standards, why it recommends a delayed date and what implementation or transition arrangements the authority intends to put in place.

References

Forum of Australian Health Professions Councils and Australian Health Practitioner Regulation Agency (2011) *Accreditation under the Health Practitioner Regulation National Law Act (the National Law)*. Accessed 28 November 2013 at: <http://www.healthprofessionscouncils.org.au/AHPRA-Reference-Accreditation-under-the-Health-Practitioner-Regulation-National-Law-Act.pdf> .

Forum of Australian Health Professions Councils and Australian Health Practitioner Regulation Agency (2012) *Quality Framework for the Accreditation Function*. Accessed November 2013 at: <http://www.ahpra.gov.au/Legislation-and-Publications/AHPRA-Publications.aspx#accreditation>. *Health Practitioner Regulation National Law Act* as enacted in each State and Territory, available at: <http://www.ahpra.gov.au/Legislation-and-Publications/Legislation.aspx>.