

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

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## Introduction

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. More information about these roles is published at <https://www.ahpra.gov.au/Accreditation.aspx>.

This paper provides guidance to Accreditation Authorities and their National Boards on communication to support the National Board/Accreditation Authority relationship. The guidance is intended to promote role clarity, transparency, trust and collaboration in this relationship and enable the Boards and Authorities to work together to ensure good decision making through frequent, clear and open communication and information sharing with each other. National Boards take into account the expertise of Accreditation Authorities when considering their advice and recommendations.

The guidance covers the following types of communication between Accreditation Authorities and National Boards - program accreditation and approval decisions, proposing and approving new or revised accreditation standards, and other situations where open communication and information sharing between National Boards and Accreditation Authorities may assist management of high-risk issues.

## Program accreditation and approval decisions

### Reporting accreditation decisions

#### Context

Accreditation of programs ensures that the education and training leading to registration as a health practitioner appropriately prepares the graduates with the knowledge, skills and professional attributes to safely and competently practise their health profession in Australia.

The accreditation process usually starts with an application by an education provider to the relevant Accreditation Authority, seeking accreditation or re-accreditation of the program. Accreditation Authorities gather information and evidence about the program and provider through this application 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.

The information and evidence gathered enables the Accreditation Authority to assess the education provider and its program against the accreditation standards. The Accreditation Authority generally prepares a report on their assessment against the accreditation standards, outlining evidence supporting the assessment. The report will state whether the accreditation standards are met and may recommend actions if they are not. This report informs the Authority's decision making on accreditation of the program including setting conditions. The National Law requires that Accreditation Authorities report on their accreditation of a program to their National Board.

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, this might include:

- a) the accreditation history of the program and, where relevant, the provider,
- b) whether the program is new or well established,
- c) 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
- d) whether any issues identified in the assessment are long standing or new.

An Accreditation Authority will also generally take account of context and circumstances in setting due dates for responses to conditions. 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 and the number and nature of any conditions imposed by the Authority on its accreditation of a program.

Where the Accreditation Authority accredits programs for a specific time period, it may accredit programs which are generally satisfactory for longer periods than programs which have numerous conditions, are still under development or are undergoing changes that may impact on their ability to meet the accreditation standards.

Consistent with the objectives of the National 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.

An Accreditation Authority will generally take account of the context and circumstances of the program and the education provider in establishing its approach to monitoring a program. Specific monitoring requirements and frequency may vary from program to program and provider to provider depending on the likelihood that the accreditation standards will continue to be met. The Accreditation Authority may monitor programs and providers with a long and generally satisfactory accreditation history less frequently and/or require less detailed information than programs and providers without this type of accreditation history.

#### Requirements under the National Law

- Under section 48(1) an Accreditation Authority may accredit a program of study if, after assessing the program, it is reasonably satisfied:
  - a) the program, and the education provider that provides the program, meet the accreditation standards; or
  - b) the program, and the education provider that provides the program, substantially meet the accreditation standards and the imposition of conditions will ensure the program meets the standards within a reasonable time.
- If an Accreditation Authority accredits a program, with or without conditions, section 48(2) requires the Authority to provide a report about its accreditation of the program to the National Board.
- Section 50(1) requires the Accreditation Authority to monitor each accredited program and the relevant education provider to ensure the Authority continues to be satisfied the program and provider meet an approved accreditation standard.
- Section 50(2) requires the Accreditation Authority to impose conditions on its accreditation, or revoke its accreditation, of a program if it reasonably believes the program and education provider no longer meet the accreditation standards.

## Good Practice

- The form of the report by Accreditation Authorities to their National Board can be an Accreditation Authority's accreditation report, or a letter and a report specifically prepared for the National Board. This process can be negotiated between each Accreditation Authority and relevant National Board.
- Although the National Law does not require the Accreditation Authority to report to the National Board about programs it has decided to refuse to accredit, Authorities may report on these decisions, and are encouraged to do so.
- Although the National Law does not specify a timeframe for the Accreditation Authority to report to the National Board, Authorities are encouraged to communicate their decisions to accredit or refuse to accredit programs to the relevant National Board as soon as practicable after each decision.
- Although the National Law does not require the Accreditation Authority to report to the National Board about its monitoring of programs unless it has decided to impose conditions or revoke its accreditation, Authorities may report on their monitoring, and are encouraged to do so.

## Guiding principles

- To support the National Board's consideration and decision on approval of an accredited program, the Accreditation Authority's report on its accreditation of a program will generally:
  - a) set out the Authority's accreditation decision and reasons, including any conditions, in terms that reflect section 48(1) of the National Law
  - b) identify the time within which the education provider is to respond to any conditions and provide sufficient information to explain the reasons for imposing any conditions.
  - c) include information that demonstrates the Authority has made a proper accreditation decision under the National Law. For example, the report might outline the following matters about the Authority's assessment of the program:
    - the type of accreditation assessment undertaken, if relevant (e.g. new program, accreditation expiring, material change to accredited program);
    - the body/committee of the Accreditation Authority that made the accreditation decision and the date the decision was made;
    - the Authority's findings against the standards, particularly those standards only substantially met or not met;
    - highlight any aspects that were different to the Accreditation Authority's usual approach to accreditation assessment, and the reasons;
    - if relevant, the outcome of any review of the accreditation process or decision completed by the Accreditation Authority at the request of the education provider
  - d) provide brief contextual information, such as a description of the program and the provider's accreditation history, where relevant
  - e) provide advice on any matters that the Authority recommends the National Board take into account when considering if the accredited program provides a qualification for the purpose of registration such as concerns about whether graduates of the program will be safe and competent practitioners
  - f) if any quality improvement recommendations are included, distinguish between these recommendations and any conditions.

- g) indicate how the Accreditation Authority will monitor the accredited program under section 50. The Accreditation Authority may indicate this by referring to its standard monitoring processes.

## Program approval decisions

### Context

The National Board uses the Accreditation Authority's report on the accreditation to consider whether the accredited program provides a qualification for the purpose of registration. The report will inform the Board's decision on approval of the program, including granting approval subject to conditions.

Graduates of a program are not qualified for registration until their program is included in the National Board's published list of approved programs. Accreditation Authorities engage regularly with education providers and it is important that the National Board advises the relevant Authority about its program approval decision as soon as possible after making the decision. This may include informal advice, ahead of the written advice required under the National Law. This open communication and information sharing will enable the Authority to manage education provider expectations, particularly if a cohort of students is due to graduate soon after the approval decision.

### Requirements under the National Law

- 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.
- Section 49(2) permits the National Board to grant approval subject to the conditions the Board considers necessary or desirable in the circumstances.
- Section 49(3) requires the National Board to give written notice of its approval to the Accreditation Authority and Ahpra.
- Section 49(4) requires the National Board to give written notice to the Accreditation Authority if the Board refuses to approve an accredited program. The Board's notice must include its reasons for the refusal and the Accreditation Authority may publish any information or advice it gave the Board about the program.
- Section 49(5) requires publication of a list of programs approved by the National Board on Ahpra's website.
- Under section 49(7), the approval of a program is not effective until it is included in the published list.

### Good practice

- If the report from an Accreditation Authority to the National Board on an accreditation decision provides the information outlined in this guidance document, Ahpra staff who support the relevant National Board will ensure the matter is considered at the next practicable meeting of the Board or its delegate (this may be a Board Committee). If Ahpra staff identify additional information that the Board may need to make its decision, they may seek further information from the Accreditation Authority to facilitate the Board's consideration.
- When the National Board receives a report from an Accreditation Authority on an accreditation decision, the Board will provide an opportunity for the Accreditation Authority to attend the relevant Board meeting to present the report and answer any questions.
- The National Board will advise the Accreditation Authority of its decision about the accredited program in writing within fourteen calendar days of that decision.

- If the National Board decides to impose conditions on its approval of the accredited program, the Board will provide an opportunity for representatives of the Accreditation Authority to discuss the decision with members of the Board.
- Although the National Law does not require a show cause period, if the National Board is considering refusing to approve the accredited program, it is encouraged to provide an opportunity for representatives of the Accreditation Authority to discuss the matter with members of the Board before confirming its decision.
- After consideration of the Accredited Authority's report, a National Board may request additional information from its Accreditation Authority to inform a decision to approve or not to approve an accredited program as providing a qualification for registration purposes.
- When approving a program that is accredited for a specific period, the National Board will generally set a date when the approval will end to align with the specific period of the accreditation.
- Accreditation Authorities will publish information (generally their website) on accredited programs and their providers.
- National Boards will announce publicly their decisions to approve accredited programs of study by adding relevant details to the list of approved programs published on Ahpra's website.

### Guiding principles

- Where the report or correspondence to the National Board from the Accreditation Authority does not provide information outlined in this guidance document, Ahpra staff who support the relevant National Board may seek clarification or additional information from the Accreditation Authority
- In making a decision to approve an accredited program, the National Board will generally not need to impose any conditions on that approval, unless imposition of conditions on graduates' registration is a proportionate response to manage risk to the public.
- 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 in the Board's communication and published list of approved programs could:
  - note that the accreditation of the program is subject to conditions, and
  - provide a link to relevant information published by the Accreditation Authority.

### Proposing and approving new or amended accreditation standards

#### Context

The Accreditation Authorities develop accreditation standards for their specific profession and propose new and amended accreditation standards to the relevant National Board for approval.

The relevant National Board is responsible for approval of new or amended accreditation standards developed by their Accreditation Authority. New or amended accreditation standards do not take effect until the National Board approves the standards and publishes them on its website.

Accreditation Authorities use accreditation standards to assess programs of study and their providers for the purposes of accreditation of the programs. Accreditation Authorities also use accreditation standards for monitoring accredited programs of study to ensure the program and its education provider continue to meet the standards. It is important that the National Board advises the relevant Authority about its approval of accreditation standards as soon as possible after making the decision. This may include informal advice, ahead of the written advice required under the National Law. This open communication and information sharing will enable the Authority to manage stakeholder engagement on implementation of new or amended accreditation standards.

## Submission of proposed new or amended accreditation standards by Accreditation Authority and consideration by National Board

### Requirements under the National Law

- Section 47(1) requires Accreditation Authorities to submit proposed new or amended accreditation standards to the relevant National Board as soon as practicable after developing the standards.
- Section 47(2) requires the National Board decide to approve, refuse to approve, or ask the Accreditation Authority to review the proposed accreditation standards as soon as practicable after the Board receives proposed new or amended accreditation standards from the Accreditation Authority.
- Section 47(3) requires the National Board to give written advice of a decision to approve the proposed accreditation standards to the Accreditation Authority and Ahpra.
- Section 47(4) requires the National Board to give written advice of a decision to refuse to approve the proposed accreditation standards to the Accreditation Authority and include the reasons for its refusal.
- Section 47(5) requires the National Board to give written advice of a decision to ask the Accreditation Authority to review the proposed accreditation standards to the Authority, including the matters the Board is asking the Authority to address before re-submitting the proposed standards to the Board.
- Section 47(6) requires publication of approved accreditation standards on the National Board's website.

### Good practice

- When submitting a proposal for new or amended standards to the National Board, the Accreditation Authority will ensure the proposal reflects the [Procedures for the Development of Accreditation Standards](#) and includes an overview of the feedback from stakeholders obtained during consultation, and how this feedback has been addressed in the proposed accreditation standards (or if it has not, broadly why not)
- If the proposal to the National Board from the Accreditation Authority provides the information outlined in this guidance document, Ahpra staff who support the relevant National Board will ensure the proposed standards are considered at the next practicable Board meeting.
- When the National Board receives a proposal for new or amended accreditation standards, the Board will invite a representative of the Accreditation Authority to attend the relevant Board meeting to present the proposed standards and answer any questions.
- The National Board will advise the Accreditation Authority of its decision about the proposed accreditation standards in writing and publish the accreditation standards on its website within fourteen calendar days of that decision, unless agreed otherwise with the Authority.
- If the National Board decides to ask the Accreditation Authority to review the proposed accreditation standards, it will provide an opportunity for representatives of the Accreditation Authority to discuss the decision with members of the Board.
- Although the National Law does not require a show cause period, if the National Board is considering refusing to approve the proposed accreditation standards, it is encouraged to provide an opportunity for representatives of the Accreditation Authority to discuss the matter with members of the Board before confirming its decision.
- When a National Board considers, based on the Accreditation Authority's advice or its own analysis, that the proposed new or amended accreditation standard will have a substantive and negative impact on the recruitment or supply of health practitioners, the National Board will advise the Ministerial Council of its view and the reasons for it so that the Ministerial Council can consider whether any action is required under s11(4) of the National Law.



## Guiding principles

- To minimise delays in National Board approval of proposed new or amended accreditation standards, Accreditation Authorities and National Boards will share relevant information during the development of the standards.
- If the proposal to the National Board from the Accreditation Authority does not provide information outlined in this guidance document, Ahpra staff who support the relevant National Board may seek clarification or additional information from the Accreditation Authority before the proposed standards are considered at a Board meeting.
- In making a decision to approve proposed new or amended accreditation standards, the National Board will generally not need to receive the evidence guide or procedural documents, unless the Board cannot determine whether the accreditation standards are fit for purpose under the National Law without such documents.
- In public communications about the decision to approve proposed new or amended accreditations standards, if a National Board wishes to highlight a transition period for their implementation, the information on the Board's communication could include a link to the Accreditation Authority website for further information on transition arrangements.

## Communication about high-risk issues related to education providers or programs

From time to time, situations may arise with an education provider or a program that create high- or extreme-risk issues<sup>1</sup> for students, graduates or the public. Examples of situations where early and open communication and information sharing between National Boards and Accreditation Authorities may assist management of high- or extreme-risk issues include:

- increases in first year enrolment leading to concerns that there will be insufficient clinical placements available for all the students in the later years of the program
- Ahpra receives a student list that includes a significant increase in the number of students enrolled in a program
- Ahpra receives a student list for a non-accredited/non-approved program
- the National Board is concerned about an increase in notifications about new graduate practitioners from a particular program

## Good practice

- The Accreditation Authority alerts the National Board and Ahpra as soon as it becomes aware of any high- or extreme-risk issues and shares information early and often to ensure that risks are averted or minimised.
- The National Board and Ahpra alert the Accreditation Authority as soon as they become aware of any high- or extreme-risk issues and share information early and often to ensure that risks are averted or minimised.

## Guiding principles

- Accreditation Authorities, National Boards and Ahpra will share information early and often whenever there is a risk that a program is unlikely to be accredited and/or approved before the education provider graduates the students

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<sup>1</sup> A high or extreme risk issue is one that could / is reasonably likely to result in graduation of students who are not safe and competent practitioners or graduation of students from a non-accredited or non-approved program who are reasonably likely to expect to be qualified for registration in the relevant profession.

- Accreditation Authorities, National Boards and Ahpra will share information early and often whenever there is a risk that a program's accreditation will be refused or revoked
- Accreditation Authorities, National Boards and Ahpra will share information early and often whenever there is a risk that a program is unlikely to graduate safe and competent practitioners