

Submission to Australian Health Practitioner Regulation Agency consultation paper: Review of accreditation arrangements – assignment of accreditation functions

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Introduction

The ANMF is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 268,500 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

Accreditation of education programs, as with all other aspects of the education of the nursing and midwifery professions, is of prime concern to the ANMF. We have contributed significantly to the work of the Australian Nursing and Midwifery Accreditation Council (ANMAC) since its inception, to ensuring the success of our professions' specific body established to manage the large volume of entry-level education programs for nurses and midwives. The ANMF continues as an active participant in ANMAC's work of providing advice and recommendations regarding these programs, to the Nursing and Midwifery Board of Australia (NMBA).

The ANMF, therefore, welcomes the opportunity to respond to the Australian Health Practitioner Regulation Agency (AHPRA) consultation on *Review of accreditation arrangements – assignment of accreditation functions*.



Summary statement

The underpinning position of the ANMF in relation to the accreditation of education programs for nurses and midwives and the role of the Australian Nursing and Midwifery Accreditation Council (ANMAC) is:

- National accreditation standards for education programs for nurses and midwives are essential for the protection of the public and maintaining the highest standards of nursing and midwifery practice;
- The determination of, and ongoing maintenance and management of, national accreditation standards for education programs for nurses and midwives, must be undertaken by the nursing and midwifery professions to ensure integrity of required discipline-specific knowledge and skills for safe and competent practice, in order to meet the NMBA standards for practice;
- ANMAC is the national accreditation body for all entry to practice education programs for nurses and midwives leading to registration as a nurse or midwife;
- ANMAC is the national accreditation body for all education programs leading to endorsement as a nurse practitioner or to scheduled medicines endorsement as a midwife.
- Under the Skills Migratory Program, ANMAC is the national body for assessment of the country of origin qualifications of internationally qualified nurses and midwives seeking registration from the NMBA;
- The accreditation process for nursing and midwifery, under the National Registration and Accreditation Scheme, must stand alone;
- Nursing and midwifery registration fees should be used to contribute to the nursing and midwifery accreditation process as undertaken by ANMAC. Nursing and midwifery must not cross-subsidise the accreditation of other disciplines;
- The fee structure that ANMAC currently uses for education providers is supported;
- The current governance structure for the constitution of the ANMAC Board ensures commitment from the nursing and midwifery professions and health care consumers.



Comment on consultation questions

The ANMF responses to the consultation questions posed in the AHPRA paper *Review of accreditation arrangements – assignment of accreditation functions*, are framed from the perspective of the nursing and midwifery professions.

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

The Australian Nursing and Midwifery Accreditation Council (ANMAC) is the professions' specific body which was established under the National Law to manage accreditation of education programs for the Nursing and Midwifery Board of Australia (NMBA). The ANMF has confidence in the accreditation processes established for the nursing and midwifery professions and has contributed significantly to the work of ANMAC in managing the large volume of programs of study for nurses and midwives.

The ANMF continues as an active participant in ANMACs work through representation on their Board, Strategic Advisory Committee, and on all accreditation standards review expert advisory groups.

The process of 'wide-ranging consultation about the content of the [accreditation] standard' (Clause 46(2), National Law) by ANMAC, and, then submitting the final version of the standard to the NMBA (the National Board for nursing and midwifery), has proven to be an effective and efficient method. This structure has strong professional ownership and, therefore, credibility and concomitant commitment of the programs authorising practice as a nurse or midwife in this country.

2. Do you have any comments on performance against the individual Quality Framework domains:

Domain 1: Governance – the accreditation authority effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role.



Although ANMAC stands as an independent organisation, accountability is assured through a) a governing Board consisting of representatives of peak nursing and midwifery professional bodies and healthcare consumers, and, b) its symbiotic relationship with the NMBA which is the final arbiter in approving accreditation standards which meet the requirements of the National Law in protecting the public.

Community directors of the ANMAC Board provide invaluable contributions to the accreditation process for education programs for nurses and midwives. Their role in the governance of ANMAC ensures the constant and consistent consideration of the perspective of those for whom the nursing and midwifery professions provide care, the people who use the health, maternal and aged care systems.

The competence and professionalism of ANMAC in the performance of its accreditation role is also visible for scrutiny during the public consultation forums conducted across the country in the development and/or review of accreditation standards for programs of study.

Nurses, midwives and consumers also hold positions on the NMBA Board and this provides another level of evaluation of the effective governance and professionalism of ANMAC in its accreditation role.

Domain 2: Independence – the accreditation authority carries out its accreditation operations independently.

While ANMAC and the NMBA have a symbiotic relationship under the National Law, they are separate entities with clear lines of authority. The safeguards in this structure work well for the nursing and midwifery professions. That is, by ANMAC (the accreditation body) being inherently linked to the NMBA (the regulatory body) this ensures programs of study for nurses and midwives meet the regulatory standards which mandate safe and competent practice for protection of the public in health, maternal and aged care delivery.

The structure enables ANMAC to perform its accreditation operations quite independently of the regulator. However, this independence does not mean ANMAC is able to determine



a separate agenda of its own, as key performance indicators are framed by the National Law. The NMBA acts as the arbiter for the profession and the public to ensure the objectives of the National Registration and Accreditation Scheme are upheld according to the National Law.

Domain 3: Operational management – the accreditation authority effectively manages its resources to carry out its accreditation function.

The ANMF is not aware of any concerns in relation to the operational management of ANMAC.

Domain 4: Accreditation standards – the accreditation authority develops accreditation standards for the assessment of programs of study and education providers.

Through an extensive and rigorous consultation process with the nursing and midwifery professions and relevant stakeholders, ANMAC has developed fair and achievable accreditation standards for the assessment of programs of study and education providers. ANMAC successfully accredits the following large number of programs, which aim to imbue knowledge, clinical skills and professional attributes necessary for safe and competent practice, after extensive consultation with the professions and consumers:

- entry-level education programs leading to registration as a nurse or midwife conducted in the university sector,
- entry-level education programs leading to enrolment as a nurse conducted in the vocational education sector, and,
- education programs leading to endorsement as a nurse practitioner or to scheduled medicines endorsement as a midwife.

The ANMF sits on all accreditation standards review expert advisory groups on behalf of our more than 268,500 nursing and midwifery members, so we have extensive interaction with ANMAC. We consider the current accreditation standards are framed to lead to programs of study which deliver practitioners whose knowledge and skill base is relevant, evidence-based and safe for contemporary health, maternal and aged care practice.



Domain 5: Processes for accreditation of programs of study and education providers – the accreditation authority applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers.

The processes employed by ANMAC for accreditation of programs of study and education providers have been refined since the establishment of ANMAC and in consultation with the nursing and midwifery professions. As stated above, we consider ANMAC has developed fair and achievable accreditation standards for the assessment of programs of study and education providers

Domain 6: Assessing authorities in other countries (where this function is exercised by the accreditation authority) – the accreditation authority has defined its standards and procedures to assess examining and/or accrediting authorities in other countries.

This is not a role ANMAC undertakes.

Domain 7: Assessing overseas qualified practitioners (where this function is exercised by the accreditation authority) – the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law, and whose qualifications are not approved qualifications under the National Law for the profession.

ANMAC has a Skilled Migration Service which assesses the knowledge, clinical skills and professional attributes of overseas qualified nurses and midwives who want to migrate to Australia under the Australian Government's General Skilled Migration program. ANMAC's role is to assess whether or not the applicant has the nursing or midwifery qualifications and experience that needed in Australia, thus deeming them eligible for permanent migration.

Registration as a nurse (registered nurse or enrolled nurse) or midwife is the responsibility of the regulatory body - NMBA. This also applies to international applicants for registration to practice in Australia.



Domain 8: Stakeholder collaboration – the accreditation authority works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities.

ANMAC engages in stakeholder collaborative activities with other accreditation bodies nationally through participating in the Health Professions Accreditation Collaborative Forum, ANMAC cooperates with other health practitioner accrediting bodies. It is through this collaborative that ANMAC has been able to reduce duplication of effort in accreditation relating to the governance of education providers.

ANMAC engages in stakeholder collaborative activities with other accreditation bodies internationally through participating in the annual International Council of Nurses Regulation and Accreditation Forum.

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 cost*

The work of the Health Professions Accreditation Collaborative Forum can achieve this through on-going discussion on identifying these areas and implementing measures to refine processes across the accreditation authorities.

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

In the initial set up of national accreditation standards by ANMAC it was important to apply common processes in terms of length of initial and re-accreditation timeframes, and monitoring procedures. With maturity of the nursing and midwifery national accreditation processes it may be timely to adopt more open-ended and risk



management accreditation cycles. This would provide for obvious cost savings for both education provider and for ANMAC as the national accrediting body.

The ANMF is aware that ANMAC is moving towards a risk-based approach to the accreditation cycle. However, this approach must take into consideration the review cycles of the accreditation standards to ensure education providers are updating their curricula to meet the most current approved accreditation standards.

The ANMF considers the current arrangement should be maintained whereby ANMAC undertakes the setting of fees and levies for funding accreditation functions. This must be determined by the national accrediting body according to a fair and equitable cost assessment and to ensure the service funding enables the most robust accreditation process. Currently the cost of assessment by ANMAC is determined by: length of program, type of accreditation (full submission or modification to an existing program), and, complexity of accreditation (for example: program offered from more than two sites; dual degrees; combined degrees; program variations).

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

ANMAC engages in stakeholder collaboration on a range of levels including, through:

- i. public consultation forums, ANMAC engages with a wide range of professional, education provider and consumer stakeholders,
- ii. attending the bi-annual meetings of the Coalition of National Nursing and Midwifery Organisations, ANMAC reaches over 55 national organisations, to present and discuss their current and future accreditation work plans,
- iii. a plethora of advisory committees for reviews of accreditation standards, ANMAC has developed strong relationships with peak nursing and midwifery professional, education and regulatory organisations and community representatives.



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

The constituents of the ANMAC Board and accreditation standards review expert advisory groups, being representatives of peak nursing and midwifery professional organisations and the community, have a vested interest in undertaking their role of monitoring the performance of the professions' accrediting body.

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 ANMF considers that the accreditation processes for nursing and midwifery have met the objectives and guiding principles of the National Scheme to a high degree by preparing work ready practitioners competent to provide safe care. We define 'work readiness' as 'workforce capability'. Graduating nurses and midwives have met the accreditation requirements which mean they have workforce capability. To achieve registration they have been deemed to be competent and safe to practice and capable of contributing to the workforce. On entering the workforce they require a supportive environment (just as a graduate of any program newly entering a workforce) in which to gain confidence in their practise and to adopt the necessary responsibilities and accountability of a registered health practitioner.

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?*

Current accreditation arrangements for the nursing and midwifery professions are affectively addressing the objectives and guiding principles of the National Scheme.

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 nursing and midwifery professions constitute just over half of all health practitioners in Australia. We already have well established frameworks which provide for consistency and commonality in the development and application of accreditation standards across all entry to practice education programs leading to registration for nurses and midwives, and, education programs leading to endorsement as a nurse practitioner or a scheduled medicines endorsement for a midwife. Education programs for the nursing and midwifery professions are complex and the accreditation standards reflecting this complexity have been derived through rigorous processes involving extensive consultation internal and external to our professions.

The ANMF considers it essential that each health professional group develop and maintain accreditation standards which will enable discipline-specific high quality educational outcomes to ensure competent and safe practitioners who exhibit best contemporaneous practice in a variety of settings. We maintain that those outside of the nursing and midwifery professions do not have a knowledgeable grasp of the responsibilities and accountabilities of the role of nurses and midwives. The development of curricula and associated learning outcomes must therefore primarily be undertaken by the nursing and midwifery professions

Where it is possible to achieve consistency and commonality of overarching accreditation standards across disciplines, the ANMF considers this already occurs through ANMAC participating in the Health Professions Accreditation Collaborative Forum.

The ANMF stresses the importance of profession-specific assessment panels – in our case this means assessment panels of nurses and midwives appraising education providers and their education programs for nurses and midwives. Our primary argument is that, to retain the integrity of programs educating safe, competent practitioners, one must have an intimate knowledge of the art and science of the profession/s being assessed.

In terms of cost outlay and the potential for increasing efficiencies for the accreditation processes (such as selection, training, composition and remuneration of assessment teams), the ANMF has not to date, and will not, support any moves for cross subsidisation by nursing and midwifery of other disciplinary groups.



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

No further comment.

Conclusion

The ANMF appreciates being able to take this opportunity to reinforce our support for the Australian Nursing and Midwifery Accreditation Council (ANMAC) as the accrediting body for the nursing and midwifery professions. Since the establishment of ANMAC, following the introduction of the National Registration and Accreditation Scheme, our professions have worked together to continually refine the processes for accreditation of programs of study for nurses and midwives.

The ANMF contends it is imperative the accreditation of the programs of study for nurses and midwives remains the remit of the nursing and midwifery professions' specific body - ANMAC. Likewise, the approval of accreditation standards for these programs must remain with the regulatory body for our professions – the Nursing and Midwifery Board of Australia. The symbiotic relationship of these two independently governed bodies is critical to retaining the integrity of programs of study for educating safe, competent nurse and midwife practitioners.