

14 May 2018

CAAN SUBMISSION: Review of accreditation arrangements – assignment of accreditation functions

The Chiropractors' Association of Australia National Ltd (CAAN) is the peak body representing the interests of Australian chiropractors and their patients. The CAA is a national organisation with state and territory branches. Please note that CAAN made a submission to the Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions. The response below is confined to that of the individual profession of chiropractic however some of the responses may be relevant across the registered professions. CAAN believes that this is the role of, and currently being achieved by the Health Professions Accreditation Collaborative Forum and the Boards.

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

CAAN Response:

CAAN supports the work of the Council on Chiropractic Education Australasia Ltd (CCEA) as the independent, nationally and internationally recognised body responsible for ensuring competency and education standards in chiropractic for the Australasian community. We understand that the CCEA recently underwent an extensive consultation and review of its standards and competencies. The new standards are based on other contemporary and evidence-based Standards, particularly those adopted by the Australian Dental Council. They were also developed with the aim of maintaining equivalence with other international standards.

Finally, we understand that the Council on Chiropractic Education Australasia, Optometry Council of Australia and New Zealand (OCANZ) and the Occupational Therapy Council Ltd recently commenced a joint project that aims to develop a common risk-based framework for use within the accreditation processes of the three Councils which may include streamlining of various processes and formats.

From a CAAN perspective, we would be seeking to have CCEA continue independently as part of the Health Professions Accreditation Collaborative Forum (HPACF) to ensure profession specific competency direction.

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

CAAN Overall comment: CAAN is satisfied with the performance of CCEA against the Quality Framework domains.

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

CAAN Response:

The CCEA is a company limited by guarantee which means Board members have very specific legal and ethical obligations. All representatives of the CCEA are expected to abide by Section 22 of the Council's Constitution and Rules dealing with 'disclosure of interests'. This is further elaborated on in the CCEA [Conflict of Interest Policy](#). We believe these measures are sufficient to manage conflict of interest issues that may arise.

- Independence – the accreditation authority carries out its accreditation operations independently.

CAAN Response:

Accredited education programs should produce graduates with the required knowledge, clinical skills and attributes to safely practice as a health practitioner and who has an appropriate foundation for lifelong learning. CAAN believes that CCEA achieves this outcome independently using a broad range of stakeholders including community members on its Board and Accreditation Committee and generally includes one non-chiropractic member on each assessment team, usually with an education or administrative background.

- Operational management – the accreditation authority effectively manages its resources to carry out its accreditation function.

CAAN Response:

The annual report published by the CEEA supports that it is managing resources effectively to fulfil its functions. We understand that the CCEA, Optometry Council of Australia and New Zealand (OCANZ) and the Occupational Therapy Council Ltd recently commenced a joint project that aims to develop a common risk-based framework for use within the accreditation processes of the three Councils which may include streamlining of various processes and formats. Nevertheless, the CAA would support further efforts to enhance interprofessional education and the promotion of interdisciplinary practice in accreditation standards.

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

CAAN Response:

CAAN is satisfied with the new accreditation standards developed by the CCEA as they based on other contemporary and evidence-based Standards

- 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.

CAAN Response:

We are satisfied with the process being fair, consistent and transparent as it is being applied.

- 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.

CAAN Response:

CCEA is part of an international collaboration and we are satisfied that they are exercising their role cognizant of the above.

- 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.

CAAN Response

Given that National Boards work closely with their accreditation authorities to effectively implement the National Registration and Accreditation Scheme and the key accreditation functions include:

- develop accreditation standards and recommend them to the relevant National Board for approval
 - accredit and monitor education providers and programs of study to ensure that graduates are provided with the knowledge, skills and professional attributes to safely practice the profession in Australia.
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- provide advice to National Boards about issues relating to their accreditation functions
- assess overseas qualified practitioners.

CAAN believes that CCEA undertakes this process appropriately as it applies to overseas registrants.

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

CAAN response:

CCEA is active in this area as exemplified by the accreditation standards developed are based on other contemporary and evidence-based Standards and developed with the aim of maintaining equivalence with international standards. We understand that principles of inter-professional learning and practice are embedded in the standards and CAAN would support further efforts to enhance interprofessional education and the promotion of interdisciplinary practice in accreditation standards.

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
- increasing transparency and accountability including in relation to cost, fees and performance
- achieving greater collaboration, sharing of good practice and multi-profession approaches including to address health workforce issues and achieve greater effectiveness
- establishing clearer performance indicators to more effectively address these issues and other key measures of performance

CAAN Response:

CAAN supports the continuance of the CCEA and if there are administrative efficiencies available, they should be considered without the loss of autonomy. We believe that this may be best explored through the cross-professional work of HPACF and the Boards to:

- Assist inter-professional education and learning particularly at institutions running more than one professional program; and to
- promote collaboration between professions, enhancing team-based care; which
- In the long term should make the accreditation process across different professions and educational institutions cheaper and more efficient; however,
- There is a risk that 'one size fits all' or common accreditation standards may not be suitable for all professions and in all cases; and
- May also weaken the sense of involvement and ownership that stakeholders and professions currently have with profession specific accreditation standards.

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?

CAAN Response:

Given the volume of complaints about chiropractors is low (notwithstanding statutory offences such as advertising) then it could be assumed that the accreditation process is addressing the objectives and guiding principles.

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?

CAAN Response:

Future arrangements will no doubt be driven by further review to ensure “fit for purpose”.

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?

CAAN Response:

We are of the view that without greater consistency and commonality in the development and application of accreditation standards, the focus of Accrediting Authorities is for the most part exclusively discipline specific. This can make it difficult to accommodate multidisciplinary education and training or to coordinate multidisciplinary accreditation processes to any great extent. CAAN would want to retain the arrangements that ensure the profession continues to be a low volume complaint profession through appropriate competency development that is oversighted by CCEA in conjunction with the Chiropractic Board of Australia. We believe that this may be best explored through the cross-professional work of HPACF and the Boards

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

CAAN Response:

CAAN supports the continued review of the scheme to ensure it meets its objectives.

Yours sincerely

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