

. Your submission

Name of person or organisation making the submission

Australasian College of Sports Physicians

Contact person Dr David Hughes - President

Telephone

Email

Information about you

Are you responding as a/an (please tick all that apply)

- ☒ Education provider
- ☒ Peak professional organisation
- ☐ Health consumer
- ☐ Community member
- ☐ Employer
- ☐ Government (eg Health Department)
- ☐ Government agency
- ☐ Health Workforce Australia
- ☐ TEQSA
- ☐ ASQA/State based VET sector regulatory authority
- ☐ Individual practitioner
- ☐ Other (please specify)

What experience have you had with the accreditation council? (please tick all that apply)

Education Providers

- ☐ The Council has undertaken an accreditation assessment of one or more of our education programs since the introduction of the National Scheme
- ☒ The Council undertook an accreditation assessment of one or more of our education programs before the introduction of the National Scheme
- ☐ We are currently planning for, or undergoing, an accreditation assessment on one or more of our education programs
- ☐ We are new to the accreditation process
- ☐ We have been through an accreditation process previously with a different accreditation body previously

Stage of accreditation assessment (if you are currently involved in an accreditation process)

- ☐ Nearing completion
- ☐ Half way
- ☐ Just commenced
- ☐ Intention to apply submitted
- ☐ Planning and preparation underway
- ☐ Have sought information or advice from the Council

Overseas qualified practitioner

- ☐ Assessment completed
- ☐ Assessment nearing completion
- ☐ Assessment just commencing
- ☐ Have sought information or advice from the Council

Other stakeholders

- ☒ Have sought information or advice from the Council on other matters
- ☒ Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- ☒ Involved Council activities eg accreditation or assessment processes
- ☐ Little or no direct engagement with Council
- ☐ Other (please specify)

Review of Accreditation Council against the Quality Framework for the Accreditation Function

.1 Governance (Domain 1):

The Accreditation Council effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role

Attributes

- The Accreditation Council is a legally constituted body and registered as a business entity.
- The Accreditation Council's governance and management structures give priority to its accreditation function relative to other activities (or relative to its importance).
- The Accreditation Council is able to demonstrate business stability, including financial viability.
- The Accreditation Council's accounts meet relevant Australian accounting and financial reporting standards.
- There is a transparent process for selection of the governing body.
- The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s.
- The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements.

Governance – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about governance is primarily at pages 3 – 11 of the report from the AMC published on the Board's website at www.medicalboard.gov.au.

Comments

ACSP is satisfied that the AMC has all the organisational attributes to effectively govern itself. AMC demonstrates competence and professionalism in the performance of its accreditation role.

AMC demonstrates this instability and financial viability, although ACSP notes that the recent withdrawal of Commonwealth funding for assessment/accreditation functions will require AMC to source of the revenue streams. There would be concerned if this resulted in undue financial duress being placed on specialist medical colleges to make up the shortfall in AMC revenue.

.2 Independence (Domain 2):

The Accreditation Council carries out its accreditation operations independently

Attributes

- Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence.
- There are clear procedures for identifying and managing conflicts of interest.

Independence – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about independence is primarily at pages 12 – 14 of the report from the AMC published on the Board's website at www.medicalboard.gov.au

Comments

The AMC has independent decision making processes.

There are no sectors that appear to have undue or excessive influence

The AMC has clear policies for identifying and managing conflicts of interest.

.3 Operational Management (Domain 3):

The Accreditation Council effectively manages its resources to carry out its accreditation function

Attributes

- The Accreditation Council manages the human and financial resources to achieve objectives in relation to its accreditation function.
- There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.
- The authority can operate efficiently and effectively nationally.
- There are robust systems for managing information and contemporaneous records, including ensuring confidentiality.
- In setting its fee structures, the Accreditation Council balances the requirements of the principles of the National Law and efficient business processes.

Operational management – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about operational management is primarily at pages 15 – 20 of the report from the AMC published on the Board's website at www.medicalboard.gov.au

Comments

The AMC is effectively managing its human and financial resources to achieve its objectives in relation to its accreditation function

The AMC has effective systems for identifying and managing risk. The AMC seeks input from a variety of sources to monitor and improve its accreditation processes.

The AMC can and does operate efficiently and effectively nationally.

The AMC has satisfactory systems for managing information and records. The AMC has good systems for managing confidentiality.

The AMC balances the requirements of the National Law and efficient business processes. The withdrawal of government funding support for the accreditation processes may have implications for the effective conduct of the accreditation process. One of the roles of the AMC, via the accreditation process, is to assist specialist medical colleges to improve their internal processes and teaching functions. If the withdrawal of Commonwealth funding were to result in a significant increase in accreditation fees charged by AMC to specialist medical colleges, then the accreditation process could change from one which is supportive and constructive to a process which is financially destabilising for the medical colleges.

.4 Accreditation standards (Domain 4):

The Accreditation Council develops accreditation standards for the assessment of programs of study and education providers

Attributes

- Standards meet relevant Australian and international benchmarks.
- Standards are based on the available research and evidence base.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The Accreditation Council reviews the standards regularly.
- In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.

Accreditation standards - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about accreditation standards is primarily at pages 21 - 24 of the report from the AMC published on the Board's website at www.medicalboard.gov.au

Comments

The AMC standards meet relevant Australian and international benchmarks

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The AMC standards are evidence-based

↓

The AMC consults widely with stakeholders when developing and reviewing the standards

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The AMC reviews the standards regularly and is planning the next review of the standards for specialist medical education and training programs for 2014

↓

When reviewing and developing standards, the AMC takes account of National Law

.5 Processes for accreditation of programs of study and education providers (Domain 5):

The Accreditation Council applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers

Attributes

- The Accreditation Council ensures documentation on the accreditation standards and the procedures for assessment is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. It's policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess professional programs of study and their providers against the accreditation standards.
- There are procedures for identifying, managing and recording conflicts of interest in the work of accreditation assessment teams and working committees.
- The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.
- Accreditation processes facilitate continuing quality improvement in programs of study by the responsible education provider.
- There is a cyclical accreditation process with regular assessment of accredited education providers and their programs to ensure continuing compliance with standards.
- The Accreditation Council has defined the changes to programs and to providers that may affect the accreditation status, how the education provider reports on these changes and how these changes are assessed.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Processes for accreditation of programs of study and education providers – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily at pages 25 – 34 of the report from the AMC published on the Board's website at www.medicalboard.gov.au) and is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the Board in the period 1 July 2010 to 1 August 2012.

Comments

-The AMC documentation relating to accreditation standards and procedures for assessment is publicly available
-The AMC clearly articulates its policies on the selection, appointed, training and performance review of assessment team members.
-Procedures are in place for identifying, managing and recording conflicts of interest in the work of assessment teams
-The AMC processes in relation to accreditation assessment are well documented and enable decisions to be made independently and free of undue influence
-A key feature of the AMC accreditation process is the facilitation of continuing quality improvement by the specialist medical education and training organisation
-Specialist medical education and training organisations are accredited on a cyclical basis with regular assessments throughout the cycle to ensure compliance with standards
-AMC has defined the changes to education programs or to the educational organisations that may affect the accreditation status. The process route for reporting these changes as well-defined.
-There are processes in place and publicly available which allow complaints, review appeals to be managed in an appropriate manner.

.6 Assessing authorities in other countries (than Australia) (Domain 6):

Where this function is exercised by the Accreditation Council, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries

Attributes

- The assessment standards aim to determine whether these authorities' processes result in practitioners who have the knowledge, clinical skills and professional attributes necessary to practice in the equivalent profession in Australia.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The procedures for initiating consideration of the standards and procedures of authorities in other countries are defined and documented.
- There is a cyclical assessment process to ensure recognised authorities in other countries continue to meet the defined standards.
- The Accreditation Council follows documented systems for decision-making and reporting that enable decisions to be made free from undue influence by any interested party.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Assessing authorities in other countries (than Australia) – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing authorities in other countries is primarily at pages 35 - 38 of the report from the AMC published on the Board's website at www.medicalboard.gov.au

Comments

In assessing/accrediting authorities in other countries, AMC standards aim to determine that the overseas authorities processes resulting practitioners who have knowledge, clinical skills and professional attributes necessary to practice in the equivalent professional/

The processes for initiating consideration of the standards and procedures of overseas authorities are defined and documented.

There is a cyclical assessment process to ensure the most authorities in other countries continue to meet the defined standards. ACSP notes that AMC planned for a review by survey in 2012. This however has been put on hold because of possible planned changes by the Health Workforce Principal Committee to dismantle the competent authority assessment process.

AMC systems for assessing competent authorities in other countries enables decisions to be made free from undue influence

There is a published process for complaints, review and appeals, although this process has not been tested.

.7 Assessing overseas qualified practitioners (Domain 7):

Where this function is exercised by the Accreditation Council, 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

Attributes

- The assessment standards define the required knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.
- The key assessment criteria, including assessment objectives and standards, are documented.
- The Accreditation Council uses a recognised standard setting process and monitors the overall performance of the assessment.
- The procedures for applying for assessment are defined and published.
- The Accreditation Council publishes information that describes the structure of the examination and components of the assessments.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessors. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess overseas qualified practitioners.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Assessing overseas qualified practitioners – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing overseas qualified practitioners is primarily at pages 39 – 55 of the report from the AMC published on the Board's website at www.medicalboard.gov.au

Comments

The AMC standards for assessing overseas qualified practitioners define the required knowledge, clinical skills and professional attributes necessary to practice in Australia

There is clear and thorough documentation, publicly available, regarding the assessment criteria, assessment objectives and standards.

AMC uses a recognised standard setting process and monitors the overall performance of the assessment of overseas qualified practitioners

Procedures for applying for assessment are well defined and available publicly

The AMC make publicly available detailed information describing the structure of the examination of the components of the assessments

The AMC has policies on the selection, appointment, training and performance review of assessors. It provides regular training workshops to improve the skills of assessors.

The AMC has a very fair and rigorous review process to manage complaints and appeals.

.8 Stakeholder collaboration (Domain 8):

The Accreditation Council works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities

Attributes

- There are processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, national boards and consumers/community.
- There is a communications strategy, including a website providing information about the Accreditation Council's roles, functions and procedures.
- The Accreditation Council collaborates with other national and international accreditation organisations.
- The Accreditation Council collaborates with accreditation authorities for the other registered health professions appointed under the National Law.
- The Accreditation Council works within overarching national and international structures of quality assurance/accreditation.

Stakeholder collaboration - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily at pages 56 - 63 of the report from the AMC published on the Board's website at www.medicalboard.gov.au

Comments

The AMC has extensive processes for engaging all relevant stakeholders, in all areas of AMC function

AMC maintains regular communication with stakeholders. The evidence from the AMC submission and from the experience of ACSP indicates that AMC has very high standards in relation to its communication with stakeholders. The AMC is very responsive to questions and enquiries from stakeholders.

AMC collaborates with other national bodies and international accreditation organisations

AMC collaborates with accreditation authorities for the other registered health professions, as outlined in its submission.

AMC adheres to the highest standards of quality assurance/accreditation

. Preliminary conclusion of the National Board about whether current arrangements are satisfactory

The National Board has undertaken a preliminary review of the current arrangements, including an analysis of risks, benefits and costs. The review was based on the submission provided by the AMC against the Quality Framework for the Accreditation Function as referenced in section 6 above and the Board's experience working with the Council over the last two years.

.1 Proposed decision of the National Board based on a preliminary review of current arrangements including analysis of risks, benefits and costs

Based on its preliminary review, the view of the National Board is that the current accreditation arrangements are satisfactory and therefore should be continued.

To what extent are you in agreement with the preliminary view of the Board?

Strongly disagree



1



2



3



4



5

Strongly agree

Please provide comments about the Board's preliminary view

ACSP strongly agrees with the preliminary view of the Board