



13 May 2018

Response to: Review of Accreditation - assignment of accreditation function

This review was prepared in consultation with academic members of staff of the School of Optometry and Vision Science (SOVS), UNSW Sydney. This response is regarding the optometric profession, of which OCANZ is the accreditation authority, and not all the professions in the National Scheme.

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

Response: We recognise and appreciate the value of the rigorous accreditation process to protect the public, and to maintain a high level of professionalism within the profession. We understand and agree with the accreditation functions under the National Law to (as described on page 5-6 of Consultation paper-review of accreditation arrangements)

- '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 practise the profession in Australia
- provide advice to National Boards about issues relating to their accreditation functions
- assess overseas qualified practitioners,'
- OCANZ does not 'assess overseas accrediting authorities' (except for the School of Optometry and Vision Science at the University of Auckland in New Zealand).

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

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

Response: We agree with the evidence presented in the Consultation Paper.

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

Response: Members of UNSW School of Optometry and Vision Science (SOVS) staff have been involved in the accreditation process. The visiting committee is made up of a diverse representation of optometric teaching institutions as well as other industry stake holders. The collaborative nature of the committee is valuable, and enhances the independence and validity of the committee which is an asset to the accreditation process

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

Response: No comment added

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

Response: The accreditation authority has clear accreditation manuals and standards that are readily available online. OCANZ has liaised with SOVS in the development of new Entry-Level Competency Standards for Optometrists (Keily Pm, Slater J Optometry Australia Entry-level Competency (ELC) Standards for Optometry 2014. Clin Exp Optom 2015; 98:65-89).

- e. 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.*

Response: No additional comment

- f. 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.*

N/A

- g. 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.*

SCHOOL OF OPTOMETRY AND VISION SCIENCE, UNSW SYDNEY NSW 2052 AUSTRALIA

T +61 (2) 9385 1000 | F +61 (2) 9385 0000 | ABN 57 195 873 179 | CRICOS Provider Code 00098G

Response: OCANZ now uses a single provider (Australian College of Optometry) to examine overseas qualified practitioners. SOVS staff are involved in the marking of written assessments. There are clear guidelines available online for potential candidates to access. SOVS is occasionally contacted by potential overseas candidates regarding registration. OCANZ is prompt at responding to these enquiries.

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

Response: OCANZ collaborated with SOVS on the development of Entry-Level Competencies. SOVS is contacted for developing questions for written examination of the overseas qualified practitioners. SOVS has been included in a workshop on the development of risk-based accreditation. There may be other collaboration both nationally or internationally. In addition, members of UNSW School of Optometry and Vision Science (SOVS) staff have been involved in the accreditation process. The visiting committee is made up a diverse representation of optometric teaching institutions as well as other industry stake holders.”

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*

Response: In addition to the fulfilling the requirement of OCANZ accreditation, our program is reviewed and regulated by UNSW. Where possible, it would be advantageous for OCANZ to accept these documents to save duplication, burden on staff time and resources.

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

Response: We appreciate efforts to minimise cost to UNSW while maintaining quality of performance.

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

Response: Opportunities to collaborate are valued, however, limited staff resources at SOVS, can, on occasion, be stretched and thus efforts focussed on a multi-professional approach should be monitored to ensure effectiveness.

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

Response: The consultation paper has provided insight into the performance of OCANZ, benchmarking them to other accrediting authorities. Regular reports have increased transparency and understanding of the responsibilities of an accreditation 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?*

Response: OCANZ appear to meet all of the objectives and guiding principles of the National Scheme.

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?*

Response: No additional comments

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?*

Response: At present OCANZ protects the public through the rigorous and consistent assessment of optometry courses. This process is specific to our profession and appears to work well. There might be some benefit to collaboration on the development of board process and regulations across professions. However, an amalgamated authority might not have the same level of understanding of our profession as the current bespoke accreditation authority.

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

Response: No additional comments.