



5 December 2012

Ms Alison Kibby  
AHPRA  
GPO Box 9958  
MELBOURNE VIC 3011

Dear Ms Kibby

Thank you for the opportunity to provide feedback to the Review of the arrangements for the exercise of accreditation functions under the Health practitioner Regulation National Law Act. Under its mandate the Australian Nursing and Midwifery Accreditation Council (ANMAC) is responsible for reviewing and improving accreditation standards for all professional categories.

Overall we would like to compliment ANMAC on the speed with which they have organised into a body that is able to monitor accreditation of courses and regulation of skilled migration.

There are however some aspects of the Council's current operation that are cumbersome, repetitive and slow. The time frame for submission of curricula for accreditation is extended and can lead to curricula being developed a full 24 months before they are implemented thus risking their ability to be at the cutting edge and contemporary. Given the large volume of work required of ANMAC this is perhaps unsurprising yet the delays in the accreditation process do also have the potential to negatively affect the business model of educator providers. Courses that are in reaccreditation phase cannot be advertised and thus potential markets for new students cannot be explored.

Given education providers are required to contribute a substantial fee for the accreditation process the timeliness of the service does need to be improved.

Some further specific comments are tendered below for your consideration

### **Domain 2 Independence**

While we agree that all steps are taking by ANMAC to achieve independence and fairness in the accreditation process and that the Accreditation Mangers are an appropriate innovation, we believe that a training program for team members would be a useful addition. The program should be aimed at advising the assessors about what constitutes appropriate evidence. It has been our experience that the team members request additional information that adds nothing to the question of whether the criteria have been satisfied but rather appear to be based on personal interest. These requests are often time consuming and can demonstrate an overzealous search for information that is not relevant to the criteria.

### **Domain 2 Operational Management**

#### *Monitoring and improving accreditation processes and risk management*

A system that allows education providers to track their submissions would be a useful addition to the information systems improvements. This would perhaps allay anxieties about the long process and reduce enquires that are made to ANMAC staff to gather information regarding the progress of the submission.

2.

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

As noted the timeframe for submission of documentation is a major concern. Please note that TEQSA must make a decision on the application within nine months of receiving it or within a longer period as determined by TEQSA, but not exceeding a further nine months.

It would be timely to review and streamline documentation to be submitted to ANMAC. It is understood that while information is required to promote rigour related to course requirements and demonstrate compliance according to the prescribed standards, the current documentation is repetitive and cumbersome. As all Australian universities are subject to accreditation by Tertiary Education Quality and Standards Agency (TEQSA) (implemented in 2012) and thus must meet rigorous standards it should be possible for ANMAC to delegate the responsibility for certain matters such as those accredited by TEQSA. These might include TEQSA's mandate:

- *To register and evaluate the performance of higher education providers against the new Higher Education Standards Framework. The Standards Framework comprises five domains: Provider Standards, Qualification Standards, Teaching and Learning Standards, Information Standards and Research Standards. The Provider Standards and Qualifications Standards are collectively the Threshold Standards which all providers must meet in order to enter and remain within Australia's higher education system.*
- *To undertake both compliance assessments and quality assessments. Compliance assessments involve auditing a particular provider's compliance against the Threshold Standards for registration as a higher education provider. Quality assessments can either be an assessment of the quality of an individual provider or a review of an issue across a number of providers (a thematic review).*

In summary we would like to suggest some improvements in the current processes and recommend:

- That a training program for team members be implemented to ensure team members are aware of their purpose and do not engage in requests for information to satisfy their own views of what constitutes proof.
- That ANMAC align its processes with those of TEQSA.
- That timeframes for accreditation be shortened through more efficient use of resources and technology. For example:
  - Individuals engage in course reviews and provide feedback using email contact that can be followed up by teleconference arrangements.
  - Consider the utilisation of the project leader and one other member of the course review team to reduce delays in arranging mutually agreeable diary dates for 4 people for a site visit. This would allow courses to be reviewed simultaneously.
  - That ANMAC review its current data to identify whether site visits have elicited any adverse findings. Using this data ANMAC could re-consider the purpose of the site visit for Higher Education providers. Given TEQSA's responsibilities in this area ANMAC could elect to accept a declaration of compliance from higher education providers and implement a process of 'spot audits'.

Again thank you for the opportunity to contribute to this review.

Yours sincerely



Professor Maxine Duke  
Head and Professor of Nursing Development  
School of Nursing and Midwifery