13 April, 2017

Dear Professor Woods,

2017 Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for Health Professions

The Council of Presidents of Medical Colleges (CPMC) is the peak body representing the interests of all specialist Medical Colleges in Australia. Individual Medical Colleges may also provide their own submission to this review on areas of particular interest to their specialty.

CPMC welcomes the opportunity to provide input to the Review.

CPMC understands that reference was made by Australian Health Workforce Ministerial Council (AHWC) to the Australian Health Ministers’ Advisory Council (AHMAC) to commission an independent review of accreditation systems based on consideration of the recommendations arising from the final report of the Independent Review of the National Registration and Accreditation Scheme for Health Professionals (NRAS Review). In that report there were significant concerns identified with the existing accreditation functions.

CPMC supports the review aim to provide advice to the Ministerial Council on the cost-effectiveness of the existing systems, the supporting governance structures and opportunities to streamline processes. It should be noted that Australia’s health care environment is complex and challenging. In the medical regulation space, there are key factors which dominate such as the continued difficulty in recruiting and retaining doctors in rural and remote areas; a consequential reliance upon international medical graduates to provide medical services; the rising chronic burden of disease with projected increased cost in services, and an ageing population. While most specialties have reached balance in supply, there remains geographic mal-distribution.

Relevant Legislation

The relevant legislation underpinning this review is the Health Practitioner National Law Act 2009 (The National Law) in place since 2010 which created a national registration and accreditation process resulting in fourteen national boards. The National Law replaced a variable and inconsistent set of State/Territory based regulatory arrangements.

Discussion Paper

CPMC has given consideration to the Discussion Paper and the review questions. As a general principle, the Council supports recommendations as to measures which will improve the efficiency of accreditation standards in Australia. The organisation tasked with the accreditation and assessment for medicine is the Australian Medical Council, which is subject to the National Law.
The AMC is a company limited by guarantee. Under the National Registration and Accreditation Scheme (NRAS) the AMC is the designated independent accreditation authority for the Australian medical profession. The AMC sets the standards, accredits and assesses the training of doctors. It receives the authority to do so from the Medical Board of Australia.

The AMC is a respected organisation which operates at the highest level of best practice in the field of accreditation. CPMC values the work of the AMC in promoting high standards of medical practice. In concert with medical schools and specialist Medical Colleges the AMC is responsible for the training of a large cohort of doctors and its work is critical to protecting consumers from unsafe care.

CPMC notes the Review wishes to explore whether an inter-relationship can be established between the existing accreditors or, indeed whether, an overarching body could be established which manages all of it. In 2015 the AMC negotiated a three year memorandum of understanding with TEQSA for information sharing purposes. This MOU is publicly available and clearly outlines the type of information that TEQSA and the AMC may share such as summation of regulatory decisions through to information which may assist each party. So given there currently exists a sharing arrangement CPMC supports any ongoing sharing arrangement. However, whether accreditation authorities should be required to incorporate the decisions of TEQSA/ASQA assessments and accreditations of education providers as part of their own reviews is only relevant where it relates to specialist Medical Colleges in the context of the AMC governance standard.

The introduction of NRAS has meant that the Medical Board registers doctors based on an accredited College assessed against the AMC standards. This is an open-ended and risk managed accreditation process which operates in a cyclical manner.

The training of surveyors undertaking the accreditation of specialist Medical Colleges is coordinated to ensure that teams are selected and trained via a workshop. The AMC chooses these teams based on a skills matrix and each team has a mix of members including experienced assessors.

CPMC notes that it will be meeting with the Reviewers at its next Board meeting and this will provide the opportunity to discuss an outcome from the review which ensures that educational programs support a sustainable health workforce which is flexible and responsive to the changing health needs of the Australian community.

Yours Sincerely

Laureate Professor Nicholas Talley
CPMC Chair