5 May 2017

COAG Health Council
Accreditation Systems Review
(by email to admin@asreview.org.au)

Submissions on discussion paper “Independent review of Accreditation Systems within the National Registration and Accreditation Scheme for Health Professions” February 2017

Thank you for the opportunity to provide comment on this important discussion document and for allowing the Board a short extension of time to make its submission.

As Professor Woods and the COAG Health Council will no doubt be aware, many of the current accreditation bodies also have direct relationships with New Zealand regulatory authorities or are joint bodies established by the two jurisdictions and are intended to be independent of both Australian and New Zealand authorities. In some cases, accreditation standards and competencies are shared between the two jurisdictions, so an important question to be answered as part of this review will therefore be the accreditation body’s autonomy and how ongoing relationships with the relevant New Zealand authorities will be addressed.

Any actions to come out of this review have the potential to impact on health regulation not just in Australia, but in New Zealand, and on mutual obligations between the two countries. It is therefore hoped that submissions on this review from New Zealand will be given the same weight as those submitted from within Australia.

Having reviewed the discussion document, the Board wishes to make the following comments:

- The Board agrees that a flexible and adaptive accreditation system is needed that proactively recognises emerging health and social care issues and priorities, and which provides direction to education providers so that curricula appropriately reflects best practice and is evidence based. Optometry currently has such a flexible and adaptive accreditation system, as evidenced by the introduction of therapeutic prescribing to all optometry programs in Australia and New Zealand in recent years.

- The Board also agrees that the cultivation of an interprofessional learning and practice culture is important, and has seen evidence of progress in this area in New Zealand. Accreditation processes do not appear to be impeding this.

- While the Board can see an argument for achieving greater efficiency by developing some common accreditation processes, and potentially some common professional competencies as well, given that public safety is paramount, this greater efficiency must not be obtained by relaxing or over-simplifying processes without due regard for the potential safety implications. Further, profession-specific input,
as opposed to cross-profession considerations, is paramount in relation to the interpretation of standards for a specific profession.

- The Trans-Tasman Mutual Recognition Act (TTMRA) enables the free movement of optometrists between our two jurisdictions on the understanding that the occupation is equivalent between our two jurisdictions. Sharing accreditation processes and ensuring that our entry-level graduates, and overseas-trained applicants being examined, are competent to practise the profession is an important part of ensuring that the profession remains equivalent. The Board would vehemently oppose any proposal for change to accreditation or examination processes, or the establishment of a ‘competent authority pathway’, that was likely to undermine the TTMRA in this regard.

- The Board regards consumer involvement in accreditation functions as essential. The Board’s shared accreditation body, OCANZ, recognises students, graduates and employers as the main ‘consumers’ of programmes of study, with the public the main beneficiary of good training. They involve all of these groups in developing accreditation standards and when conducting accreditation processes.

- The Board feels very strongly that fees for carrying out examination and accreditation functions should remain reasonable, and in order to achieve this and in taking into account the public benefit of safe and competent practitioners, the Board believes this necessitates contributions being made by registrants (via the relevant regulator) and education providers, and in the case of examinations, by overseas applicants.

- The current process of individually examining overseas-trained optometrists against the Australian and New Zealand competency standards for entry-level optometry practice is working well to assure public safety. In the absence of workforce shortages, and with no pattern of consistent results for applicants from any country undertaking the OCANZ examinations, the evidence does not support change.

- The Board is not persuaded that national examinations should be introduced as a useful way to determine the educational quality of programmes of study. The Board believes that valid and reliable assessment methods are best evaluated within the overall context of assessment in the specific programmes of study. This is in line with the risk level of the particular profession, rather than in line with an abstract uniform standard. The cost of such examinations is also bound to fall on the student, which for the profession of optometry, could deter students from entering the workforce.

We trust that our submission will assist the review process, and that our request to be directly involved in matters of importance to New Zealand will be recognised. Please feel free to contact me on 0064 4 474 0705 or email Lindsey.Pine@odob.health.nz, if you wish to discuss this submission.

Yours sincerely

Lindsey Pine
Registrar
Optometrists and Dispensing Opticians Board