1 May 2017

Professor Michael Woods
Independent Review of Accreditation Systems

Via email: admin@asreview.org.au

Dear Professor Woods,

Response to Accreditation Systems Review Discussion Paper

Thank you for the opportunity to provide a response to the Discussion Paper released on 27 February 2017 regarding the Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professionals (the Woods Review).

The Psychology Board of Australia (PsyBA) has made a separate submission to the review because the regulation of psychology is somewhat different from the other 13 health professions in the scheme. The PsyBA response therefore varies in important ways from the other AHPRA-Board submission.

Psychology is not exclusively a health profession, and much of what psychologists do does not relate to the delivery of health services in clinical settings. Regulation of psychology is important for public protection. However, it must also bring to bear broad expertise around the specific competencies and ethical codes and guidelines accepted by the profession of psychology relating to the diverse contexts and clients of psychology services. All psychologists can be dangerous and practice unethically and incompetently, therefore the general regulation of psychology is appropriate.

Psychology is both an important hub science and an applied profession. It is practiced widely across many government and non-government settings in many settings beyond the health context, such as education, the legal system, the military, sport, human resources, statistical and human factors services, community, business and industry. The Board therefore must be mindful of the broad range of industries and areas where psychologists practice, and concurrently must ensure the accreditation standards and arrangements cover all the competencies expected by the public and employers of independently practicing psychologists in diverse contexts, both in basic and applied practice.

Psychology is also one of the five large high risk professions, and nationally receives over 500 complaints against practitioners. We work in partnership with AHPRA, and recognise that our roles are different but complementary. The PsyBA regulates all 34,000 psychologists in Australia. Psychology accreditation is complex, with over 500 accredited courses across 41 higher education providers. The accreditation scheme therefore must be fit for purpose for psychology and retain the right expertise. Further information about the Board's work can be found at www.psychologyboard.gov.au.
Relationship between accreditation and registration, good governance, workforce reform and efficient decision making

19. Do National Boards as currently constituted have appropriate knowledge, skills and incentives to determine accreditation standards and programs of study which best address the workforce needs of a rapidly evolving health system?

Yes. The tight connection between accreditation and registration is currently working well in psychology and is recommended to be retained in the national law. Boards are senior leaders and are selected based on attributes relevant for leadership and public protection. They understand the workplace, contemporary practice and risks to the public. It is good governance to have a separation between accreditation and regulatory roles, however both need to have the right expertise and profession specific input in decision making. The Accreditation standards must align with the Board's registration standards. To bring about change needs leadership that is both expert and appropriate to have the support of all groups, including universities, councils, the Board and government.

25. What is the optimal governance model for carrying out the accreditation functions provided in the National Law while progressing cross-profession development, education and accreditation consistency and efficiency? Possible options include:

- Expanding the remit of the AHPRA Agency Management Committee to encompass policy direction on, and approval of, accreditation standards;
- Establishing a single accreditation authority to provide policy direction on, and approval of, accreditation standards.

The Board does not support adding another layer of decision making or government. The proposal that the Agency Management Committee or another body have a role in decision making is not supported by the Board as a new entity will not have the expertise to make these decisions across 14 professions. The independent reviewer states "The scope and scale of accreditation activities is significant. The AHPRA Accreditation Liaison Group (ALG) has advised that, in 2015-16, the 14 accreditation authorities were responsible for 23 professional streams at a general registration level and 37 specialist streams. This equated to the regular monitoring and reporting of approximately 746 individual programs across Australia, and 338 education providers." To establish an over-arching body to oversee all this work would be expensive and add to the burden on registrants who fund the scheme. Such a body could not have the expertise to approve standards, therefore would rely upon advice from Boards, leading to double handling and delays.

Having approval from the relevant Board is right touch given the expertise needed is already held by Boards, and the tight link to registration and public protection is upheld.

Psychology is complex and requires high level expertise. Developing another body for decision making will add further cost and may inhibit innovation an increase red tape. Additional bureaucracy may impede workforce reform rather than enhance it. National leadership and reform is already in train across the professions, and is working well under the new NRAS.

It is true that innovation in the health workforce is always needed and new models of care and service delivery need to be assessed and modelled. Decision making presents important opportunities for reform. Reform is best made by Employers, Educators, Councils, Regulators and others joining together to create change. A generic decision maker across a complex scheme does not have the expertise or 'skin in the game' to lead change identified by the expert reviewer. Innovation and workforce reform and leadership must be driven from within by bringing all the major stakeholders together, and are provided by the current arrangements. The current arrangements have provided a number of benefits which may be lost if a generic body without the right expertise were handed approval processes. The consultation paper does not provide convincing arguments around cross-profession reform and the complexity given industrial arrangements are determined by states and territories and employment decisions are held by multiple agencies and levels of NGO and Government. Reform in the health sector workforce is most likely to come from employers defining new roles, working with training agencies to develop pathways for students to get the relevant training with a proposed job at the end, and for this to be then accredited and form part of the regulatory standards of Boards. The NRAS is a blunt
instrument based on public protection, and may not be the right focus for some areas discussed as needing reform.

20. Would greater independence of accreditation authorities, in the development and approval of accreditation standards and/or approval of programs of study and providers, improve alignment of education and training with evolving needs of health consumers?

No. The Board does not support the separation of the Accreditation function from Registration. A fracture between Registration Boards and Accreditation Councils with concomitant degraded coordination would stifle innovation, hamper opportunities for leadership and innovation, and may worsen public protection. If accreditation standards were the defacto registration standards, then the accreditation councils would need to defend these in legal proceedings. At present, the registration board is the party to legal proceedings brought by individuals relating to the application of standards to their individual circumstances. Accreditation standards must relate to registration standards, which then relate to public expectations around competence to practice. The balance between innovation and public protection is a feature of the current arrangements and separation of powers works well. The consultation paper does not consider these issues and does not bear sufficiently on the protective jurisdiction of the NRAS.

30. How best can a national focus on advice and reform be provided, at least for the delivery of accreditation functions, that:

- As part of a broader workforce reform agenda, regularly addresses education, innovative workforce models, work redesign and training requirements?
- Has regular arrangements for engagement with key stakeholders such as the regulators, educational institutions, professional bodies, consumers and relevant experts?

The current arrangements allow for these things and are already occurring. For psychology, the current arrangements have only been operating since 2010, but have already led to:

- **innovation in workforce reform leading to a more innovative, efficient and effective scheme:** we have led significant reform in psychology training starting with a national psychology summit in December 2015 and reform process involving all the major stakeholders - government, AHMAC and HWPC health workforce, allied health advisors, universities and heads of schools, students, the profession, employers, the accreditation council and regulators. There has been a significant piece of work done by the Board in collaboration with these groups around **streamlining training pathways and reducing red tape** through a national Education and Training Reform project (for further details, see the August 2016 PsyBA communiqué http://www.psychologyboard.gov.au/News/Communiques.aspx). This has been in response to feedback from health workforce, Ministers and the public that psychology training pathways need to be less complex, more efficient, and benchmarked internationally.

- **improvements in the independence and governance** of the accreditation council has been achieved through the current arrangements. The Board has led a process of moving from an accreditation body owned by the profession and housed within the profession, to an independent board and new constitution based in independent premises - ensuring it met the governance expectations of the NRAS. This was achieved because of the powers in the current law given to the Board in determining the accreditation function;

- **cross-profession harmonisation of accreditation standards.** The Australian Psychology Accreditation Council have adopted the Dental template in designing new fit for purpose psychology standards which are competency based and best practice for the Australian and international context. Thus, the current arrangements are already leading to harmonisation and cross-profession efficiencies for higher education providers;

- **enhancement of interprofessional learning** has already been included in psychology training by the Board and Council - supervision by non-psychologists, sharing generic mental health workforce competencies and participation in shared training and generic competencies across professions, shared training experiences across faculties including in indigenous health, have all been enhanced;
- **innovation in training models including simulated learning, distance education and remote supervision** through electronic communications. Both the registration and accreditation standards have been revised to allow more efficient and effective training models including enhancing remote and rural training opportunities and efficient simulated learning models;

- **decisions made by those with the right expertise.** Having accreditation councils as the experts developing standards and assessing courses, then independent approval for those standards and courses resting with the Board, provides the right governance and independence in decision making between the two separate entities. This maintains the confidence of the public and the profession. Both entities hold the relevant expertise to be able to make those decisions, meaning the right people with the right set of skills and experience are making the critical decisions. The independence of the Board from the Council has allowed expert and impartial review, applying the right expertise in a transparent and effective way.

The **system is broadly efficient and has provided the right levers for innovation and reform to be coordinated** across the sector with independence and impartiality of decision making. However, the Board recognises there are continued opportunities for reform and welcomes the work of the independent reviewer around further streamlining arrangements and costs where appropriate.

### National examinations

Q18. Does a robust accreditation process negate the need for further national assessment to gain general registration? Alternatively, does a national assessment process allow for a more streamlined accreditation process?

Examinations form an important basis for assessment in all professions, whether these are held individually within the accredited training courses, or externally as national examinations.

Examinations have a different purpose to accreditation. Accreditation is more “formative” in that it outlines evidence for institutional quality assurance of the curriculum and overall student experience, whilst an exam is "summative" in that it tests actual individual performance. One should lead to the other, therefore there is a need for both accreditation and examinations along the pathway to ensuring work readiness. They serve different functions but both are requisite.

National examinations are used in other jurisdictions for the same reason, for example the Examination for Professional Practice in Psychology examination in the USA and Canada has been operating successfully since the 1960s and harmonises a common standard for entry to the profession despite different pathways and educational contexts and arrangements across the 64 jurisdictions of North America.

National examinations are needed when accreditation does not alone provide quality assurance of fitness to practice. In Psychology, two ministerial council approved pathways to registration rely upon unaccredited workplace internships. The content and form of these vary widely, making a national examination a way of assuring competence despite widely different education experiences during intern training, or from those trained overseas.

35. **Should there be a greater focus on assessment processes that lead to general registration for overseas trained practitioners without additional requirements such as supervised practice and how might this be achieved?**

The Board has instigated a national psychology examination for internationally trained practitioners to streamline the assessment process. Such a proposal was first made by psychology regulators in Australia over 30 years ago, and has now been achieved through the NRAS. This has significantly reduced the burden and removed the need for long supervised practice provisions.
Assessment of overseas health practitioners

32. Are there any reasons why processes for having qualifications assessed for skilled migration visas cannot be aligned with those for registration that are conducted under NRAS?

The PsyBA supports alignment and hence streamlined pathways for individuals and believes this could be an important outcome of the review.

33. Is there a defensible justification for the bodies who have been assigned responsibility for accreditation of Australian programs not being assigned the function to assess overseas trained practitioners?

Accreditation Councils assess programs of study that prepare candidates for practice. Registration Boards assess individual applicants for their individual registration certificate. Individuals from overseas apply to the Board to register in Australia, making the registration board an appropriate entity to assess their application including their training, qualifications, skills, experience and suitability for practice, in a \textit{one-stop-shop} assessment for fitness to practice. This streamlines the process and reduces the costs for individuals as there is a single assessment fee.

Assessment of qualifications by an accreditation council creates a duplicate and more costly process, as a separate assessment would then need to be conducted by the Board for the purposes of registration, leading to double-handling and increased cost and delays.

Yours sincerely

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Chair, Psychology Board of Australia