27 April 2017

Professor Michael Woods  
Independent Reviewer  
Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professions  

Sent to: admin@asreview.org.au

Dear Professor Woods,

Re: RACMA’s Submission to the Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for Health Professions

The Royal Australasian College of Medical Administrators (RACMA) is a specialist medical college of more than 1000 Fellows, Associate Fellows and trainees in public and private health settings across Australasia. The College sets standards and provides professional development and specialist qualifications in medical management and leadership to registered medical practitioners.

RACMA’s Fellows are registered medical practitioners trained in the recognised specialty of medical administration. The specialist role of medical administration includes expertise in clinical governance, engagement and performance management of medical staff, and credentialing.

RACMA welcomes this opportunity to respond to the consultation on the Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for Health Professions (The Review).

RACMA agrees to this submission being treated as a public document and being cited in any reports that may result from this consultation process.
RACMA is generally supportive of the principles and recommendations put forward in the consultation paper. However, would like to highlight the following:

1. The process of accrediting specialist medical practitioners works reasonably well, and while there may be some minor improvements, RACMA does not see any need to fundamentally change it.
2. We believe that in the most part the role and processes of the Australian Medical Council (AMC) work well in accrediting specialist medical college programs. Therefore, in any quest to achieve increased efficiency across the accreditation authorities, we recommend any changes do not denigrate the effectiveness of the AMC.

3. There may be some merit in:
   a) Issue #3 – *Open ended and risk managed accreditation cycles*: Open ended or risk based accreditation cycles may assist with reducing the high burden associated with accreditation without risking that the standard of medical specialists trained by the Colleges will be compromised. Although AMC accreditation is every 10 years, the AMC requires annual reports against the full set of standards, mid-cycle reports and a visit, and a comprehensive review report two years before reaccreditation. In addition, the College needs to report on meeting mandatory directives as well as suggested improvements. The distinction between these is often not as clear as it should be. For some Colleges this is known to contribute to lengthy additional discussions and anxieties. This prolonged and protracted process places enormous resource burden on the Colleges and the AMC. RACMA is beginning to believe this is an unnecessary requirement and blurs the requirements of compliance and continuous improvement. Having said this, the criteria and requirements of risk based accreditation programs would need to be further explored and understood so that they don't further increase the burden of College reporting requirements, or unnecessarily require Colleges to move to shorter accreditation cycles.
   
   b) Issue #2 – *Incorporating decisions of TEQSA/ASQA*: There may be some benefits of applying the learnings of universities to Colleges in respect to the incorporation of TEQSA/ASQA assessments and accreditations as part of the AMC review.
   
   c) General comment relating to improving efficiency: The differentiation between governance and compliance with operational standards could be improved with improved accreditation structures and collaborative arrangements.

4. There is recognition that post graduate medical specialist training is different to undergraduate health professional training, and this system needs to be maintained to support the training (Fellowship and ongoing training) needs of medical specialists.
Thank you for the opportunity to comment.

Yours sincerely,

Dr Karen Owen
Chief Executive