Below are seven key issues which undermine the effectiveness of the accreditation systems within the National Registration and Accreditation Scheme for health professions.

1. There is insufficient independence of accreditation bodies and their governing boards. This compromises the efficiency of accreditation, with flow-on negative outcomes for the tertiary education providers and for the profession. Example: In 2014 the Australian Psychology Accreditation Council (APAC) initiated an overhaul of the psychology accreditation standards. The new standards were completed and subject to stakeholder review in mid-2014. Following that consultation process, the standards were revised but the final draft has been repeatedly held up as a result of independent input from the Psychology Board of Australia, which appears to have the “last word” on what should be included in the new standards, over and above the public consultation and revision. The back-and-forth between APAC and the Board has resulted in a complete stalling of the new standards, such that institutions are now informed that they will not be available until 2018. That it should take 4 years to generate revised accreditation standards is simply unacceptable. Accrediting bodies should be granted the responsibility of developing standards and Boards should be responsible for ensuring those standards are met, thereby fulfilling two complimentary but independent functions.

2. The current siloed system of distinct accrediting bodies and profession Boards encourages “turf wars” amongst allied health professions. This limits opportunities for inter-professional education and undermines inter-professional respect in the workplace. Example: APAC refuses to accredit postgraduate courses with enrolments that are shared across different professions, e.g. students training in mental health nursing or counseling cannot sit in the same courses as psychologists-in-training.

3. Education providers should be given the authority to determine the suitability of student placements. The accreditation standard for field supervisors in psychology for instance, has become increasingly prescriptive and onerous resulting in many outstanding supervisors dropping out of the system.
4. National examinations should not apply to Masters-trained professionals. It is absurd to require these students to take a national examination when they have just completed a postgraduate qualification that has included two years of continuous academic and competency assessments.

5. The current model of highly centralized accreditation systems is expensive. The focus is on monitoring compliance with a complex and arbitrary set of rules and the burden of reporting against those rules is costly. Example: the fee for the accreditation visit by APAC to a Go8 School of Psychology in 2016 was over $100,000. The indirect costs for staff involved in preparing the application and responding to requests for additional information was over $70,000.

6. The standardization of professional training programs is overly prescriptive and often focuses on monitoring inputs rather than assessing outcomes. This limits the capacity of education providers to be innovative and to respond flexibly and nimbly to changing conditions in the sector. Example: the Australian Psychology Accreditation Council (APAC) currently requires all accredited postgraduate programs to teach the same set of core capabilities and attributes. These represent narrow view of what it is to be a psychologist, and do not adequately reflect the diversity of the discipline. Not all psychologists are therapists, therefore it is inappropriate to expect that all graduates from accredited psychology training programs should be able to deliver cognitive behaviour therapy, perform a mental status examination and provide counselling.

7. Prescriptive regulations regarding staffing make it difficult for universities to run professional training programs. Example: The current accreditation standards for psychology require at least 50% of staff teaching into professional programs to be registered and endorsed. The requirement for registration and endorsement is making it impossible for many universities to staff these programs. The result has been the widespread closure of programs over the past decade in areas such as organisational, sport, counselling and health psychology, despite the fact that student and employer demand is growing rapidly. This is having a negative impact on workforce capacity, which runs counter to the guiding principles of the National Law.