



OTC statement of assessment against AHPRA's Procedures for development of accreditation standards and COAG principles for best practice regulation

The Occupational Therapy Council (Australia & New Zealand) Ltd (OTC) has taken into account the Australian Health Practitioner Regulation Agency (AHPRA) *Procedures for the Development of Accreditation Standards* (AHPRA, 2011) in the development of the proposed accreditation standards for consultation.

These procedures were developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law).

The *Procedures for the Development of Accreditation Standards* are available at: <http://www.ahpra.gov.au/Publications/Accreditation-publications.aspx> as attachment 4 in *Accreditation under the National Law Act* (2012).

Below is the OTC's assessment of its proposed accreditation standards against the four elements identified in the AHPRA procedures, including the COAG Principles for Best Practice Regulation.

<p>1. The proposed accreditation standards take into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law, in particular a), c) and f) of the objectives and a) of the guiding principles.</p>

The objectives of the National Registration and Accreditation Scheme (NRAS) particularly relevant to accreditation are:

- (a) to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered;
- (c) to facilitate the provision of high quality education and training of health practitioners;
- (f) to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.

The guiding principle particularly relevant to accreditation:

- (a) the scheme is to operate in a transparent, accountable, efficient, effective and fair way.

OTC assessment

The OTC considers the proposed accreditation standards meet the objectives and guiding principles of the National Law, in particular a), c) and f) of the objectives and a) of the guiding principles.

The proposed accreditation standards, if approved, will provide for the protection of the public by ensuring that only graduates with the knowledge, skills and attributes necessary to practise in a competent and ethical manner qualify for registration in the profession.

The proposed accreditation standards will facilitate the provision of high quality education and training of health practitioners, by requiring education providers to demonstrate they have established appropriate mechanisms to ensure protection of the public, good governance, quality assurance, appropriate program design, content and assessment, including of clinical/practice education.

The proposed accreditation standards enable innovation in education of health practitioners by requiring evidence of outcomes of the program, rather than demonstration of compliance with prescribed inputs.

The proposed accreditation standards also support the NRAS to operate in a transparent, accountable, efficient, effective and fair way by recognizing existing regulation and quality assurance systems in higher education in Australia (including TEQSA) and by clearly describing the criteria that must be demonstrated to meet the proposed accreditation standards.

2. The consultation requirements of the National Law are met

OTC assessment

The National Law requires wide-ranging consultation on the content of the proposed accreditation standards. The OTC has undertaken preliminary consultation with key representatives of the occupational therapy profession and occupational therapy educators.

The OTC is providing an opportunity for public comment about the content of the proposed accreditation standards by undertaking an eight-week public consultation process. This process includes the publication of the consultation paper on the OTC website and a targeted mail-out to relevant stakeholders. The public consultation phase provides opportunity for wide-ranging consultation, including with the practice profession, education sector, peak bodies and government agencies, about the content of the proposed accreditation standards

The OTC has drawn the public consultation document to the attention of key stakeholders, including those who provided comment on the current accreditation standards and those considered to have a particular investment in the standards. For example, peak bodies for Aboriginal and Torres Strait Islander Peoples health and those for consumer advocacy.

The OTC will take into account the feedback it receives when finalising the proposed accreditation standards for submission to the Occupational Therapy Board of Australia (OTBA) for approval.

3. The proposed accreditation standards take into account relevant international standards and statements relating to education and training in the profession, and the accreditation standards applied in countries with comparable education and practice standards for the profession.

OTC assessment

The proposed accreditation standards are informed by review of relevant international standards and statements relating to education and training in occupational therapy, accreditation standards applied in countries with comparable education and practice standards for the profession. These include international standards set by the World Federation of Occupational Therapists (WFOT) and the occupational therapy education and accreditation standards in the USA, New Zealand, the United Kingdom and Canada. In addition, standards and statements relevant to accreditation more broadly have been considered, including those from recent reviews of the NRAS.

The proposed accreditation standards will continue to address the international expectations set by the WFOT for the education of occupational therapists. This will support an existing arrangement whereby the OTC accreditation informs the accreditation process used by the professional association, Occupational Therapy Australia to determine if a program meets the WFOT standards and can be listed as WFOT approved. Graduation from a WFOT approved program supports assurance of internationally accepted standards and international mobility of graduates.

4. The proposed accreditation standards take into account the COAG Principles for Best Practice Regulation

OTC assessment

In developing the proposed accreditation standards for consultation, the OTC has addressed the Council of Australian Governments (COAG) Principles for Best Practice Regulation.

As an overall statement, the OTC has taken care not to propose unnecessary regulatory burdens that would create additional costs for education providers, the profession or the community.

The OTC has made the following assessment specific to each of the COAG principles identified in the AHPRA procedures.

a. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

The development of accreditation standards and the assessment of programs of study against these standards are fundamental determinants of quality of education and training of health practitioners.

The National Law provides for protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

The OTC considers the revised accreditation standards are the best option for achieving its purpose to protect the public by ensuring that an accredited program of study is able to prepare graduates who are competent to practise occupational therapy.

The proposed accreditation standards meet current Australian and relevant international benchmarks, are based on research and current evidence, have and will incorporate stakeholder views and incorporate issues of national importance by including perspectives of Aboriginal and Torres Strait Islander Peoples, consumer engagement and inter-professional practice.

b. Whether the proposal results in an unnecessary restriction of competition among health practitioners

The proposed accreditation standards do not result in an unnecessary restriction of competition among health practitioners, nor are they expected to impact on the current levels of competition amongst current or potential education providers.

c. Whether the proposal results in an unnecessary restriction of consumer choice

The proposed accreditation standards will continue to support consumer choice by providing clear requirements for education providers that are seeking accreditation of occupational therapy programs of study. The proposed accreditation standards provide clear requirements to be met by education providers that are seeking accreditation of their programs of study and clearly indicate the standards address protection of the public.

d. Whether the overall costs of the proposal to members of the public and/or registrants, and/or governments are reasonable in relation to the benefits to be achieved

The OTC has determined that the proposed accreditation standards will incur the costs comparable to current accreditation processes.

There may actually be some cost efficiencies for education providers as the proposed accreditation standards have been harmonised with those of other accreditation authorities and encourage education providers to use material prepared for other reporting purposes, rather than generating separate data. This process also supports recognition of interprofessional education within education providers.

The OTC considers the overall costs to be reasonable in relation to the benefits to be achieved.

The aim of the proposed accreditation standards is to contain the costs of accreditation by requiring assessment only of the program elements considered essential to assure the OTC and Occupational Therapy Board of Australia (OTBA) that graduates of accredited programs are prepared to practise as safe, ethical and competent occupational therapists.

e. Whether the proposal's requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

The proposed accreditation standards have been written in plain English and are considered to be clear and unambiguous, will support consistent judgments by education providers, assessment team members, the OTC and the OTBA, as well as understanding by the public and registrants.

f. Whether the accreditation authority has procedures in place to ensure the proposed standard remains relevant and effective over time

The OTC reviews accreditation standards at least every five years for referral to the OTBA, consistent with the cycle of review of standards by most other regulated health professions as well as the current accreditation cycle. The OTC is aware that the OTBA, as the body responsible for the approval of the accreditation standards, has discretion as to the review timetable and may ask OTC to review the standards earlier, if this is necessary to ensure the continued relevance of the standards.