

Accreditation Services Risk Framework

UNDER

Version Control

Version	Date	Amendments
1.0	February 2017	First version

Responsible Officer Director Accreditation Services
Review Date September 2017

Contents

Purpose of the Accreditation Services Risk Framework	1
Introduction to ANMAC and risk-based accreditation	2
Australian Nursing and Midwifery Accreditation Council	2
Risk-based accreditation approach	2
Overview of risk-based accreditation	3
Purpose of accreditation	3
Aims of a risk-based approach	4
Approach	4
Risk Framework—six steps	8
1. Scan	9
2. Identify	9
3. Analyse	10
4. Assess	10
5. Treat	12
6. Monitor	13
Administration	14
Communication	14
More information	14
Glossary and abbreviations	15

Purpose of the Accreditation Services Risk Framework

The Accreditation Services Risk Framework (Risk Framework) details how the Australian Nursing and Midwifery Accreditation Council (ANMAC) implements a risk-based approach to accreditation.

It is an information source for both ANMAC and stakeholders

The Risk Framework underpins the accreditation system.

UNDER REVIEW

Introduction to ANMAC and risk-based accreditation

Australian Nursing and Midwifery Accreditation Council

The Australian Nursing and Midwifery Accreditation Council (ANMAC) is the independent accrediting authority for nursing and midwifery education under Australia's National Registration and Accreditation Scheme.

ANMAC helps to protect the health and safety of the Australian community by establishing high-quality standards of nursing and midwifery education, training and assessment.

ANMAC facilitates the development of accreditation standards in consultation with our stakeholders and representatives from the professions involved. ANMAC is also responsible for determining whether programs of study for nurses and midwives seeking to practice in Australia meet required accreditation standards.

Risk-based accreditation approach

All education providers of nursing and midwifery programs are subject to a national accreditation process. This process is robust, standards focused and risk based.

ANMAC has developed this Accreditation Services Risk Framework (the Risk Framework) to underpin the risk-based approach to every accredited nursing and midwifery program.

Overview of risk-based accreditation

Purpose of accreditation

Accreditation ensures the quality of nursing and midwifery professions on behalf of public interest and public safety. It involves comprehensively examining education programs against relevant accreditation standards. It lets the public know that graduates of accredited nursing and midwifery programs are competent to practise safely and effectively, and eligible to be registered with the Nursing and Midwifery Board of Australia (NMBA) as a nurse or midwife in Australia.

ANMAC's accreditation process supports diversity, innovation and evolution in education. Periodic accreditation of nursing and midwifery programs stimulates education providers to review and assess their programs. It enables them to validate the strengths of existing programs, identify areas for improvement and introduce new teaching and learning initiatives.

The key stakeholders who benefit from accreditation of nursing and midwifery education programs are listed in Table 1.

Table 1: Key stakeholders who benefit from accreditation of nursing and midwifery education programs

Community	Education providers	Students
Community is assured that only appropriately trained and accredited nurses and midwives are able to practise. This ensures the highest levels of health, safety and confidence for the public.	Education providers are supported in offering high-quality programs to nursing and midwifery students. Through accreditation, students are assured they are meeting the required standards. Accreditation also identifies strengths and areas for improvement in education programs.	Students are confident they are receiving high-quality education in nursing and/or midwifery that meets required standards and will allow them to apply for registration as a nurse and/or midwife.
Other regulators	Professions	Government
Other regulators are confident graduates of accredited programs are trained to meet required standards and eligible for professional recognition. Other regulators are assured they receive information and advice from the education program accrediting authority.	Nursing, midwifery and related professions are confident graduates are competent and meet required standards. They are also confident they can contribute to the development of standards so they reflect current best practice. In doing so, these professions maintain their reputation as a quality, regulated and trustworthy profession.	Government is confident all nursing and midwifery programs in Australia meet required standards and all practising nurses and midwives are registered in line with the <i>National Law</i> . The Government is also confident the safety of students and the public is assured.

Aims of a risk-based approach

In applying a risk-based approach to accreditation assessments, ANMAC must meet its requirements as the independent accrediting authority for nursing and midwifery under the National Registration and Accreditation Scheme.

This provides the following benefits:

- improving the ease of use and efficiency of the accreditation process for education providers demonstrating they have a low-risk program
- focusing ANMAC resources on education providers and programs which present the most risk to students and/or the community
- building collaborative relationships with education providers
- increasing capacity for ANMAC to identify and respond to risks
- increasing the transparency of processes and decisions
- improving accreditation processes so they are cost effective and efficient.

Approach

The Accreditation Services Risk Framework is based on the principles of the ISO 31000:2009 Risk Management Standard. It underpins an objective, consistent and risk-based approach to accreditation. The Risk Framework comprises these three components, which are integrated but conducted separately.

1. Risk Assessment Anniversary of accreditation (annual)	2. Accreditation 5 years	3. Monitoring Ongoing
--	------------------------------------	---------------------------------

The risk assessment and risk rating of high, medium or low assigned to all nursing and midwifery education programs influences these three key areas of the accreditation process:

1. program accreditation
2. program changes
3. monitoring.

These three standard components are consistently applied to all education programs and all education providers.

1. Risk assessment

The risk assessment process applies a set of risk determinants and measurable indicators to all programs offered by education providers. Each program is given a risk rating. An education provider offering multiple programs may have different risk ratings applied to different programs.

The risk assessment process is based on measurable indicators, including:

- previous experience in delivering a nursing or midwifery accredited program
- history of compliance with accreditation standards
- current conditions on a program imposed by ANMAC or another regulatory body

- substantiated complaints against a program
- number of campuses at which a program is delivered.

ANMAC understands that some risk is inevitable for programs to maintain a contemporary approach and continuously improve. Low levels of risk can be managed with appropriate controls.

ANMAC conducts annual risk assessments to keep all risk profiles up-to-date. The risk rating is subject to change, either up or down, depending on factors such as monitoring, significant changes in program delivery or substantiated complaints. The risk rating determines how the education program will be monitored.

2. Accreditation

Under Section 49(1) of the *Health Practitioner Regulation National Law 2009 (Qld)* (the National Law), graduates of nursing and midwifery programs cannot be registered or endorsed unless the program undertaken is accredited by ANMAC and approved by the NMBA. Therefore, all education providers of nursing and midwifery programs are subject to the national accreditation process.

The accreditation process is robust, standards focused and risk based. A program's risk rating determines how an education provider completes the accreditation application. Low-risk programs do not have to provide evidence against all standards criterion. Medium-risk and high-risk programs, new programs and new nursing and midwifery education providers must provide evidence against all standards criterion.

ANMAC's Associate Director Accreditation Services (Associate Director) and assessment team assess the information in the application pack against the accreditation standards. As part of the assessment, the assessment team conducts a site visit to the education provider to discuss the Application Pack, interview teaching and support staff and students, and tour facilities.

At the end of the assessment, the assessment team makes a recommendation on accreditation to the Accreditation Committee. The Associate Director Accreditation Services conducts the program's first risk assessment and assigns a risk rating. The Accreditation Committee makes the accreditation decision after reviewing the information and recommendation provided by the assessment team.

ANMAC then reports the accreditation decision to the NMBA to make the final accreditation decision. ANMAC informs the education provider of the NMBA's decision.

3. Monitoring

Section 50 of the National Law requires ANMAC to monitor programs of study approved by the NMBA to ensure the program and education provider continue to meet the approved accreditation standards. ANMAC has developed routine, targeted or random monitoring methods. This enables ANMAC to tailor monitoring and assurance activities to each program.

Monitoring of an accredited program can include:

- reviewing the Program Monitoring Report provided by the education provider
- reviewing reporting requirements
- conducting site visits
- managing complaints.

Methods of monitoring are predominately determined from the program's risk rating. Low-risk programs have lower monitoring requirements. High-risk programs have higher monitoring requirements.

The monitoring activities are described in detail in ANMAC's [National Accreditation Guidelines](#).

4. Timing

Risk assessments are conducted annually and programs are accredited every five years. The activities related to the risk assessment and accreditation cycles are depicted in Figure 1.

Existing education providers with new programs or new education providers

ANMAC becomes aware of existing education providers with new programs or new education providers when an [Intention to Submit](#) form is received. Following receipt, ANMAC sends the education provider an Accreditation Schedule and application pack (Figure 1) 'Start new application'.

The cycle commences for the new program at 'Submit new application'. The first risk assessment for the new program occurs at 'New application risk assessment'.

Once the program is approved, annual risk assessment will occur on the anniversary of approval of the program with submission of the Program Monitoring Report.

Education provider with approved program

ANMAC sends education providers with approved programs, the Accreditation Schedule and Application Pack 18 months before the accredited program is due to expire.

The accredited program continues in the cycle and submits the Program Monitoring Report in year four of the cycle. ANMAC conducts the final risk assessment at 'Yr 4', before the education provider submits the completed application. If the Year 4 Risk Assessment results in a higher risk rating (from Year 3), ANMAC will request additional information from the education provider.

ANMAC conducts a risk assessment of the new program at the 'New application risk assessment' point of the cycle.

Once the program is approved, annual risk assessment will occur on the anniversary of approval of the program with submission of the Program Monitoring Report.

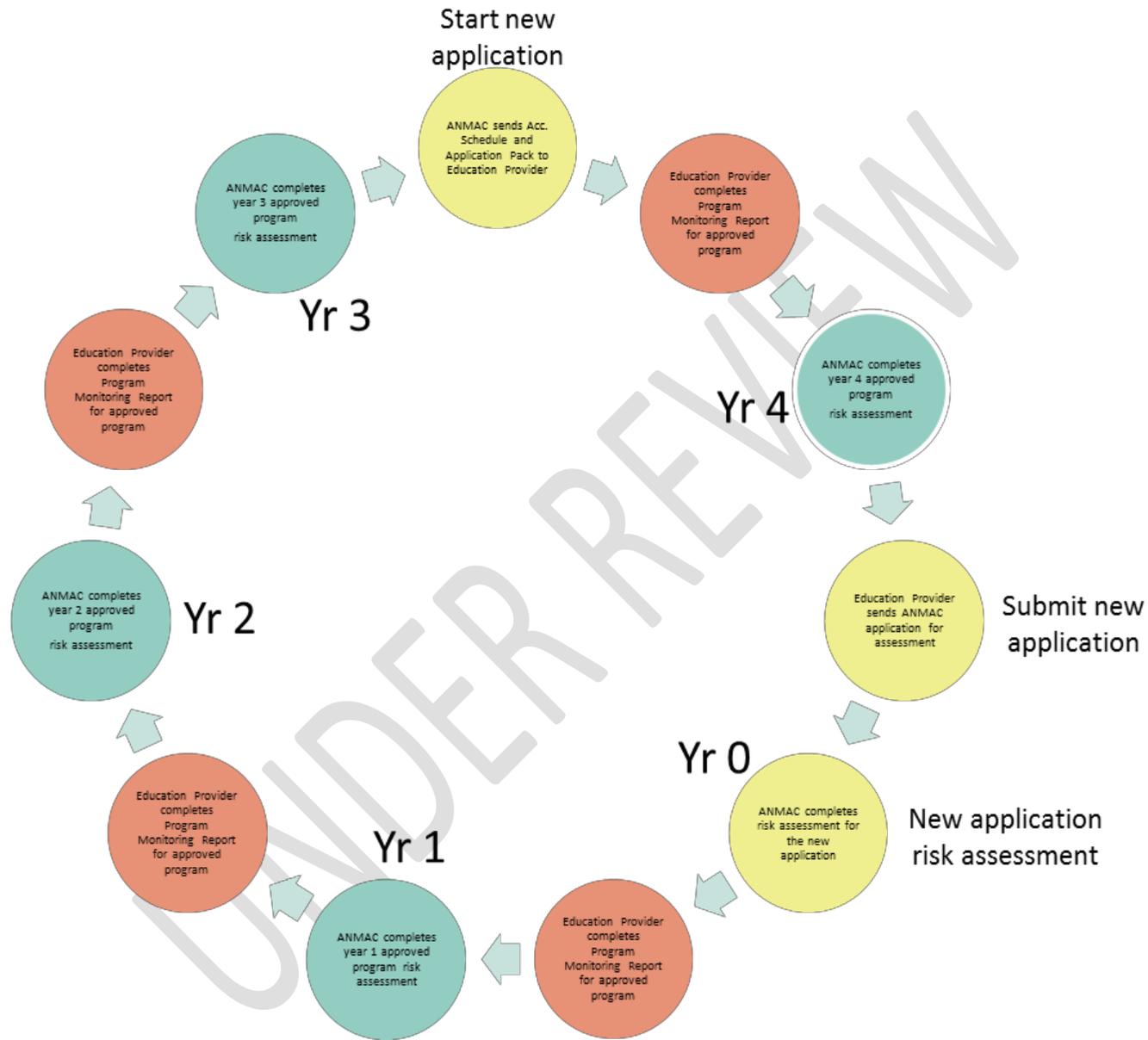


Figure 1: Risk assessment and accreditation cycle

Risk Framework—six steps

The six steps of the Risk Framework are shown in Figure 2. They cover risk assessment, accreditation assessment and ongoing monitoring of the education program.

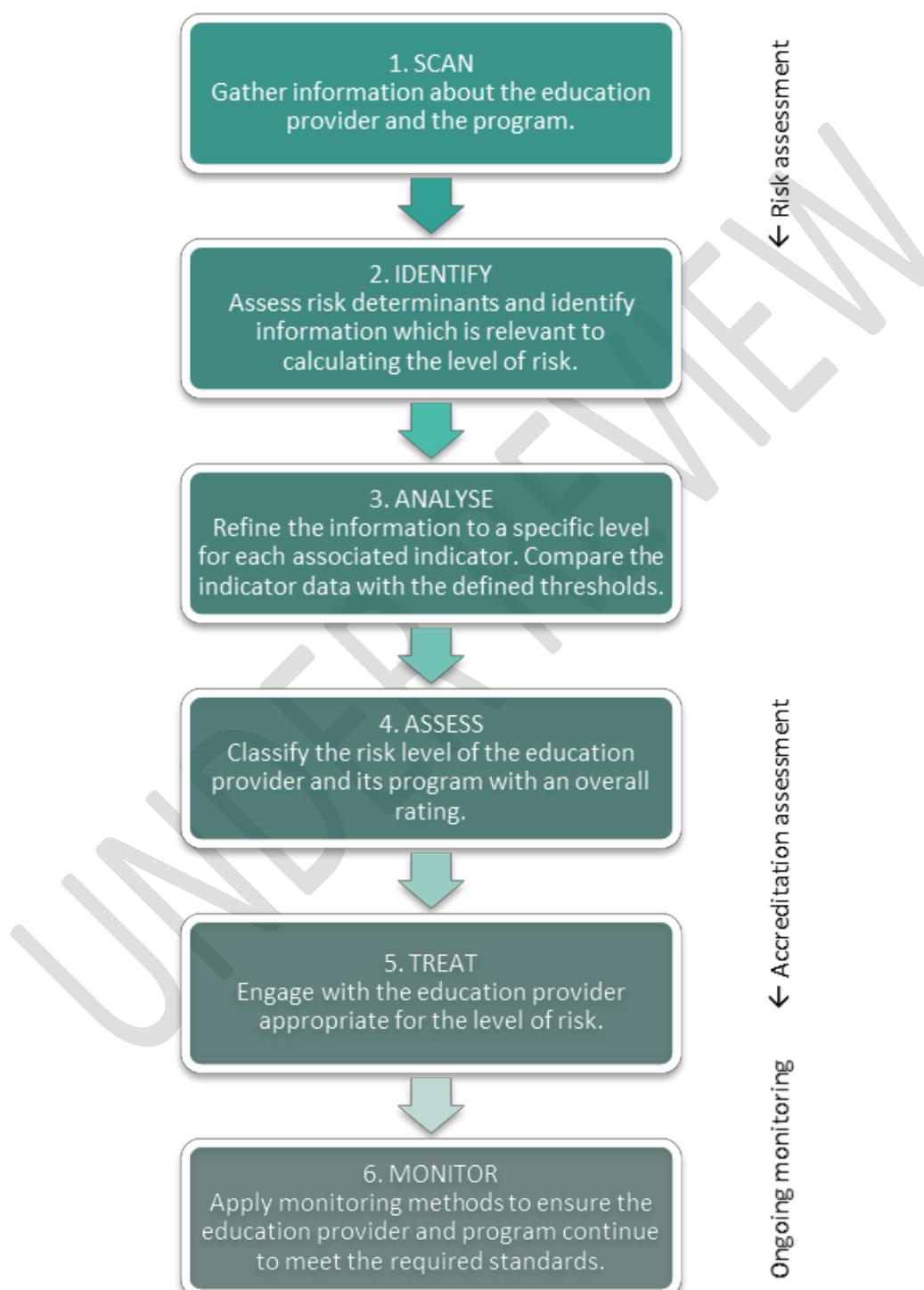


Figure 2: Six steps of the Risk Framework

1. Scan

The first step of the Risk Framework is to scan the environment for information about the education provider and program.

This involves ANMAC gathering general contextual information and data on the education provider and program to gain a holistic picture. It can involve ANMAC:

- compiling and reviewing previous ANMAC risk assessments and accreditation assessments results
- collecting and reviewing information about the education provider's regulatory history from other bodies
- assessing recent political or regulatory changes that might affect the education provider's information or performance
- analysing media coverage of or other sources of information on the education provider, programs, student interest, market and other topics
- asking the education provider to submit any other required information that ANMAC cannot access.

2. Identify

Once the scan is complete, ANMAC focuses on assessing four key risk determinants and information that is relevant to calculating the level of risk (Table 1).

The four key risk determinants are essential areas for investigation and are weighted for importance. ANMAC assesses a number of associated indicators for each to determine risk and determine whether a program meets standards.

Table 2: Four key risk determinants and associated indicators used in ANMAC's risk assessment

Regulatory history, standing and governance (40%)	Human resources (30%)	Physical resources (20%)	Student experience and outcomes (10%)
<ul style="list-style-type: none"> • registration with the Tertiary Education Quality Standards Agency or the Australian Skills Quality Authority • conditions from other regulators or previous 	<ul style="list-style-type: none"> • staffing changes • student to staff ratio • resources for program delivery 	<ul style="list-style-type: none"> • geographic dispersion • quality, quantity and sustainability of resources 	<ul style="list-style-type: none"> • assessment • student support • professional experience placement

ANMAC conditions			
<ul style="list-style-type: none"> complaints program changes 			

3. Analyse

The data relating to each risk indicator is refined or converted to a measurable, objective figure, based on likelihood and consequence. ANMAC compares the indicator data to the risk thresholds to determine a risk level for each indicator. This paints an initial picture of the education program's status.

4. Assess

Risk assessment

ANMAC combines the risk levels for each indicator using an algorithm and forms one risk rating for the education program.

This algorithm is based on the weighted importance of the risk indicators (40 per cent to 10 per cent, Table 2) associated with the four key risk determinants. Top priority indicators calculated as high-risk can automatically result in an overall high-risk rating.

The final result is the classification of education programs into a risk pyramid (Figure 3). This determines further engagement for accreditation and monitoring.

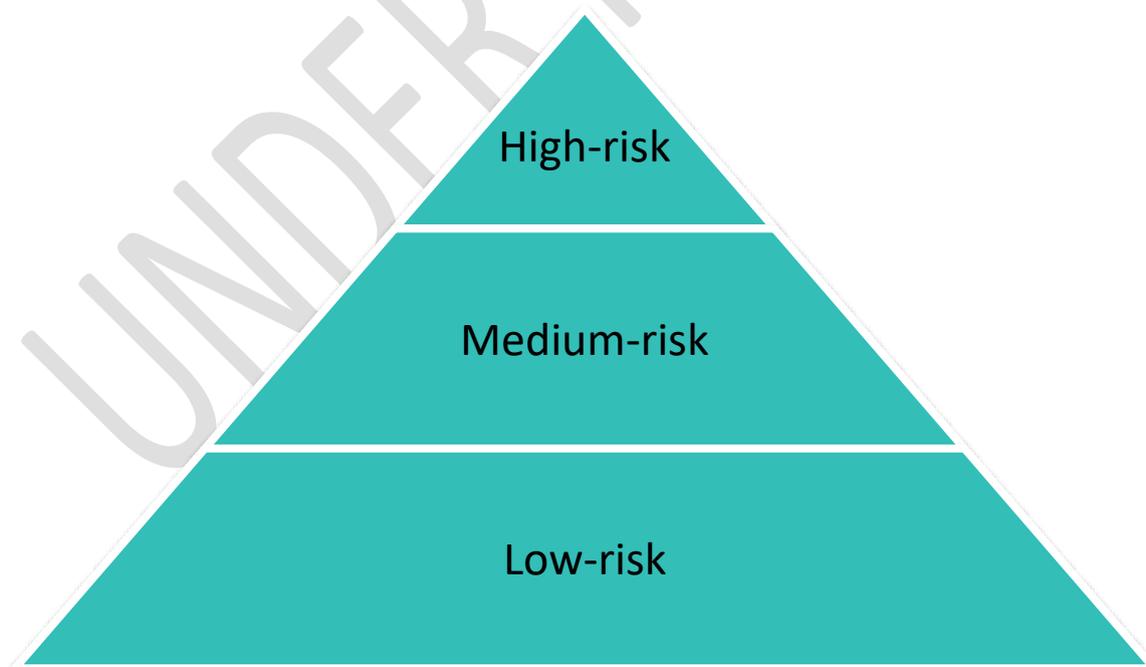


Figure 3: Risk Pyramid

An explanation of each of the risk levels follows:

High-risk

High-risk ratings may result when the majority of the measured indicators confirm there is increased likelihood of the program not being delivered as accredited. For example, programs with:

- conditions imposed by ANMAC or other regulatory body
- multiple campuses
- substantiated complaints
- unapproved changes.

Medium-risk

Medium-risk ratings may result when some of the measured indicators confirm there is increased likelihood of the program not being delivered as accredited.

Low-risk

Low-risk ratings may result when few or none of the measured indicators are present and therefore it is likely that the program will be delivered as accredited.

Accreditation assessment

Confirmation of risk rating

Each time ANMAC receives new information, a check is performed to ensure the information is commensurate with the risk rating. If it is not, the risk rating can be adjusted. ANMAC's approach to accreditation and/or monitoring can also be adjusted.

ANMAC keeps education providers informed of changes in risk ratings throughout the accreditation process and can ask for more information if required.

Table 3: Variations of accreditation assessment for each risk rating.

Risk rating	Application Pack	Assessment team	Site visit	Monitoring
High-risk	Application Pack requires full detail and evidence for all criteria	Assessment team size selected depending on required expertise	Mandatory	Increased program monitoring, including routine, targeted and random opportunities
Medium-risk	Application Pack requires full detail and evidence for most criteria	Assessment team size selected depending on required expertise	Mandatory	Greater focus on program monitoring, targeted at identified risks
Low-risk	Application Pack requires full detail and evidence for some criteria	Assessment team size selected depending on required expertise	Usually required	Program changes can be first reported in the Program Monitoring Report

Accreditation process

The level of evidence required when applying for accreditation is determined by the program's risk rating. Some actions could be varied throughout the accreditation process, as outlined in Tables 3 and 4.

Table 4: Actions that could vary throughout the accreditation process, depending on program's risk rating

Action	New provider and/or program	Low-risk	Medium-risk	High-risk
Intention to submit	Required	Not required	Not required	Not required
Application pack	Tailored pack for new provider and/or Program	Tailored pack for low-risk program	Tailored pack for medium-risk programs	Tailored pack for high-risk programs
Assessment team	Tailored to new provider	Tailored to low-risk program	Tailored to medium-risk program	Tailored to high-risk program
Site visit	Mandatory	Usually required	Mandatory	Mandatory

5. Treat

The main point at which treatment is important is the accreditation process. This is when ANMAC decides to grant or withhold accreditation.

Following risk assessment, ANMAC will engage with education providers regarding program changes and monitoring appropriate to the level of risk. Table 5 shows ANMAC's strategy for engaging with education providers and programs of different risk levels.

Risk management

Once risk is assessed, ANMAC manages the risk by taking one of these three actions:

No action—If the risk assessment does not uncover significant risks, no action is required. The risk rating is monitored through annual risk assessments and reported on in the education provider's Program Monitoring Report.

Recommendation—If there are risks not significant enough to warrant immediate action, ANMAC can recommend mitigation to the education provider.

Investigation—If significant risks are uncovered that ANMAC believes pose a risk to student outcomes and/or community safety, ANMAC can undertake a more in-depth investigation. This can result in conditions and/or regulatory action (including more frequent monitoring) outside of the next scheduled accreditation process.

Table 5: Engagement strategy for each risk rating

Risk rating	Engagement Strategy
High-risk	Prospective changes and targeted monitoring
Medium-risk	Combination reporting of changes and targeted monitoring
Low-risk	Retrospective reporting and routine monitoring

6. Monitor

Section 50 of the National Law requires ANMAC to monitor programs of study approved by the NMBA to ensure the program and education provider continue to meet approved accreditation standards until the next accreditation assessment.

ANMAC has developed monitoring methods—routine, targeted or random. This enables ANMAC to tailor monitoring activities to each program.

Monitoring of an accredited program can include:

- reviewing the Program Monitoring Report provided by the education provider
- reviewing reporting requirements
- conducting site visits
- reviewing complaints management.

Methods of monitoring depend on the program's risk rating. Low-risk programs have lower monitoring requirements. High-risk programs have higher requirements.

Administration

Communication

A risk assessment is conducted by an Associate Director Accreditation Services and endorsed by the Director Accreditation Services. ANMAC communicates the program's risk rating to the Education Provider in writing. Risk assessment results are treated confidentially by ANMAC. To promote transparency and encourage improvement, ANMAC communicates program risk ratings to education providers after each annual risk assessment.

A provider can ask for more information on risk assessment results. ANMAC can share more details if deemed appropriate.

ANMAC can publish aggregated risk rating results and analyses. These are de-identified and do not contain any provider risk-level information.

More information

ANMAC is committed to further developing and refining this Accreditation Services Risk Framework over time so it provides the best outcomes for ANMAC, education providers, students and the community.

To this end, ANMAC consults relevant stakeholders and makes information available to the public as the Risk Framework is developed or further refined. Feedback is therefore welcomed.

For more information, queries, or to submit feedback, please:

- visit ANMAC's website at <http://www.anmac.org.au> or
- contact ANMAC at <http://www.anmac.org.au/contact-us-general-information>.

Glossary

Term	Definition
Approved Program	A program of study that has been accredited by ANMAC and approved by the NMBA. Approved programs will appear on the AHPRA Approved Programs of Study (APoS) list, once on the APoS list, students may be enrolled into the program.
Australian Health Practitioner Regulation Agency (AHPRA)	The organisation responsible for the implementation of the National Registration and Accreditation Scheme across Australia. AHPRA supports the National Health Practitioner Boards in implementing the National Registration and Accreditation Scheme. AHPRA manages the registration and renewal processes for health practitioners and students around Australia.
Australian Nursing and Midwifery Accreditation Council (ANMAC)	The independent accrediting authority for nursing and midwifery under the National Registration and Accreditation Scheme. In this role ANMAC is responsible for developing the content of accreditation standards and determining whether programs of study for nurses and midwives seeking to practice in Australia meet the required education standards. This contributes to protecting the health and safety of the community.
Governance	The framework, systems and processes supporting and guiding an organisation towards achieving its goals and the mechanisms by which it, and its people, are held to account. Ethics, risk management, compliance and administration are all elements.
Graduates	Those who, having successfully undertaken a program of study that enables them to apply for registration or endorsement with the NMBA.
Health Practitioner Regulation National Law Act 2009 (the National Law)	This legislation contained in the schedule to the Act, provides for the full operation of the National Registration and Accreditation Scheme for health professions from 1 July 2010 and covers the more substantial elements of the national scheme, including registration arrangements, accreditation arrangements, complaints, conduct, health and performance arrangements, and privacy and information-sharing arrangements. The purpose is to protect the public by establishing a national scheme for regulating health practitioners and students

Term	Definition
	undertaking programs of study leading to registration as a health practitioner.
High Risk Program	<p>High-risk ratings may result when the majority of the measured indicators confirm there is increased likelihood of the program not being delivered as accredited. For example, programs with:</p> <ul style="list-style-type: none"> • conditions imposed by ANMAC or other regulatory body • multiple campuses • substantiated complaints • unapproved changes
Low Risk Program	Low-risk ratings may result when few or none of the measured indicators are present and therefore it is likely that the program will be delivered as accredited
Measured indicators	<p>Used in the risk assessment, they are:</p> <ul style="list-style-type: none"> • Previous experience in delivering a nursing or midwifery accredited program • History of compliance with accreditation standards • Current conditions on a program imposed by ANMAC or another regulation body • Substantiated complaints against a program • Number of campuses at which a program is delivered
Medium Risk Program	Medium-risk ratings may result when some of the measured indicators confirm there is increased likelihood of the program not being delivered as accredited.
Monitoring	<p>As described in Section 50 of the National Law, ANMAC monitors programs of study approved by the NMBA to ensure the program and education provider continue to meet the approved accreditation standards. This consists of routine, targeted or random monitoring methods. Monitoring of a program can include:</p> <ul style="list-style-type: none"> • Reviewing the Program Monitoring Report provided by the education provider • Reviewing reporting requirements • Conducting site visits • Reviewing complaints
Nursing and Midwifery Board of Australia (NMBA)	The national regulator for the nursing and midwifery professions in Australia. It is established under the Health Practitioner

Term	Definition
	Regulation National Law, as enacted in each state and territory. Its primary role is to protect the public and set standards and policies that all nurses and midwives registered within Australia must meet.
Professional experience placement	The component of nursing education that allows students to put theoretical knowledge into practice within the consumer care environment. It includes, but is not limited to, the hospital setting, and may include general practice, remote and rural health clinics, and community care environments. It excludes simulation.
Program Changes	A change to an approved program of study against the relevant standard the program is accredited against. Program changes are notifiable to ANMAC based on the risk rating of the program. Program changes are notifiable prospectively or retrospectively.
Program Monitoring Report	A report (completed by the education provider) designed to confirm that a program continues to be delivered as accredited, against the relevant accreditation standards. This report is required to be submitted to ANMAC routinely on the anniversary of the program's accreditation. If the document is not submitted, it may place the ongoing accreditation of the program in jeopardy.
Program or program of study	The full program of study and experiences that are required to be undertaken before a qualification, such as a statement of completion or attainment, can be awarded.
Prospective Program Change	<p>A change that must be notified to ANMAC BEFORE it is implemented. This will change depending on the risk rating of the program, but always includes:</p> <ul style="list-style-type: none"> • New sites • Increases in student numbers over the maximum number of students/cohorts allowed for the accredited program • Change to delivery mode for a program
Random Monitoring	A random monitoring activity may be a request for information relating to a specific standard or criteria, an additional program monitoring report or a site visit. Random monitoring activities can occur regardless of the risk rating of a program.
Retrospective Program Change	A change that may be notified to ANMAC after it occurs. This only applies to Low and Medium risk programs and is any change (other than what

Term	Definition
	must be notified prospectively) to the approved program against the relevant standard the program is accredited against. These changes are notified to ANMAC via the Program Monitoring Report.
Risk assessment	Risk assessment applies a set of risk determinants and measurable indicators to all nursing and midwifery education programs. It is based on the principles of ISO 31000:2009 Risk Management Standard.
Risk management	ANMAC's risk assessment for Nursing and Midwifery programs incorporates: <ul style="list-style-type: none"> • Identify risks/hazards • Assess the likelihood of the risks occurring and the severity of the consequences if the risks do occur and • Prevent the occurrence of the risks, or minimise their impact.
Risk Rating	Completion of a risk assessment using measurable indicators results in a risk rating of high, medium or low. The risk rating determines how a program will be monitored.
Routine Monitoring	Routine monitoring occurs annually. ANMAC will send a link for the Program Monitoring report to the education providers 30 days before the due date (the anniversary of approval of the program). A reminder will be sent 14 days before the program is due. Routine monitoring activities will occur regardless of the risk rating of the program.
Standard	A level of quality or attainment.
Targeted Monitoring	Targeted monitoring will occur based on the measured indicators that show increased risk. Targeted monitoring may include requests for information relating to a specific standard or criteria, an additional program monitoring report or a site visit. Targeted monitoring will occur for medium and high risk programs.