

Protocol for the review and development of accreditation standards

Contents

Background	1
Australian Nursing and Midwifery Accreditation Council	1
Legislative and regulatory context	1
Review of accreditation standards	3
Development and review process	3
Aim of accreditation standards review	3
Stages of the accreditation review and development process	4
Professional Reference Group	5
Consultation paper 1	5
Stakeholder consultation	5
Consultation paper 2	6
Final draft of accreditation standards	7
Submit final accreditation standards to the ANMAC Board	7
Submit to Nursing and Midwifery Board of Australia for final approval	7
Launch revised standards approved by Nursing and Midwifery Board of Australia	7
Appendix 1	8

Background

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 professional representatives. ANMAC is also responsible for determining whether programs of study for nurses and midwives seeking to practice in Australia meet required accreditation standards.

Legislative and regulatory context

The *Health Practitioner Regulation National Law Act 2009* (the National Law) establishes a national registration and accreditation scheme for health practitioners. It was successively passed in states and territories to start on 1 July 2010.

The National Registration and Accreditation Scheme was established by intergovernmental agreement on 26 March 2008. It provides for a single national registration board and a single national accreditation function for each of the 10 health professions that joined the scheme in July 2010. The scheme's intention is to better deal with workforce shortages and/or pressures faced by Australia's health workforce. It also aims to increase the flexibility, responsiveness, sustainability and mobility of the health workforce, and reduce red tape.

Under Section 49(1) of the National Law, graduates of programs of study are not eligible for registration or endorsement unless their program of study is accredited by ANMAC and approved by the NMBA. This is part of a broader process of assuring the community that, having completed an accredited program of study, beginning professional practitioners have achieved agreed professional outcomes and are able to practise in a safe and competent manner. This means they are equipped with the necessary foundation knowledge, professional attitudes and essential skills.

Section 42(a) of the National Law describes the accreditation function of appointed accreditation authorities as:

- a. Developing accreditation standards for approval by a National Board.

Reviewing and developing accreditation standards involves considering the purpose of professional education accreditation. This is concerned with the quality of the profession and its work, from the perspective of public interest and community safety.

This process relies on these two fundamental principles on which the accreditation standards framework is built:

1. education providers themselves are authorised to issue the relevant qualification and evaluated to assure continued quality learning outcomes for their graduates (Tertiary Education and Quality Standards Agency; Australian Skills Quality Authority; Australian Qualification Framework)

2. a set of agreed and contemporary standards for practice exists against which the capability of intending graduates of entry to practice programs can be assessed (Nursing and Midwifery Board of Australia standards for practice).

Accreditors of health practitioner programs of study must ensure professional standards are protected without inhibiting diversity and innovation or constraining continuous quality improvement. ANMAC must observe the 'Procedures for the development of accreditation standards' (Appendix 1) as determined by the Australian Health Practitioner Regulation Agency under Section 25 of the National Law. In line with Section 46(2), ANMAC must ensure wide-ranging consultation on the content of new or revised standards.

As an accreditation authority, ANMAC must submit the accreditation standards it develops to the NMBA for approval. Section 11 of the National Law permits the Australian Workforce Ministerial Council to give direction to the NMBA about the policies it applies for this approval but only if proposed standards are considered to have a substantive and negative impact on the recruitment or supply of health practitioners. In issuing such direction, the Council must consider the potential impact on quality or safety of health care.

Review of accreditation standards

The 'Protocol for the review and development of accreditation standards' (the Protocol) details ANMAC's consultation procedures for upholding the Council of Australian Governments' principles for best practice regulation (continuity, targeting, appropriate timeliness, accessibility, transparency, consistency and flexibility, evaluation and review).

The review and development process for accreditation standards must take into account the objectives and guiding principles in the National Law. In particular the following objectives of the national registration and accreditation scheme:

- 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 review and development of accreditation standards must align with the guiding principles of the National Registration and Accreditation Scheme, which is to operate in a transparent, accountable, efficient, effective and fair way.

Development and review process

ANMAC's review process ensures that stakeholder feedback and expert opinion is sought and that relevant national or international benchmarks and the best available evidence is used in developing standards. The iterative process for stakeholder consultation gives ANMAC an opportunity to:

1. validate whether revised accreditation standards are accurate and relevant for a contemporary Australian health care system and education environment
2. evaluate whether the expectations on education providers to meet the revised standard are reasonable in terms of benefits and burdens.

Stakeholder-identified benefits and burdens are considered by the Office of Best Practice Regulation during its preliminary assessment of the revised standards for their regulatory impact. A robust review process is essential for ANMAC to assure the NMBA and the community that a graduate of an accredited nursing and/or midwifery program is eligible for registration and can practice in a safe and competent manner.

Aim of accreditation standards review

The review aims to revise accreditation standards so they are:

- contemporary and aligned with emerging research, policy and relevant industry guidance

- able to ensure that nurses and midwives are suitably educated and qualified to practise in a competent and ethical manner to the required NMBA standards for practice
- acceptable to the profession and relevant stakeholders
- able to support continuous development of a flexible, responsive and sustainable Australian health workforce
- supportive of innovation in the education of health practitioners
- acceptable to the community in supporting safe, accessible, quality care
- supportive of recruitment and supply of nursing and midwifery workforce.

Stages of the accreditation review and development process

Stage	ANMAC task	Purpose
1	Establish a Professional Reference Group (PRG)	Comprises key stakeholders responsible for providing advice, understanding and having knowledge of key issues likely to affect the review and development of the accreditation standards. Responsible for analysing stakeholder feedback and responses to feedback.
2	Develop consultation paper 1	Describes context of and framework for the review and development of the accreditation standards. Evaluates current accreditation standards and identifies key issues to consider in the review and development of the accreditation standards.
3	Stakeholder consultation	Engage stakeholders to provide feedback on consultation paper 1.
4	Develop consultation paper 2	Provides initial draft of accreditation standards, taking into consideration feedback from the first consultation stage. Explores outstanding issues identified by the PRG and stakeholder feedback from the first stage of consultation.
5	Stakeholder consultation	Engage stakeholders to provide feedback on consultation paper 2.
6	Develop final draft of accreditation standards	Provides final draft of accreditation standards, taking into consideration feedback from second consultation stage.
7	Stakeholder consultation	Engage stakeholders to provide feedback on final draft of accreditation standards.
8	Develop final accreditation standards	Provides final accreditation standards, taking into consideration feedback from third consultation stage.
9	Submit final accreditation standards to the ANMAC Board	Conduct final check to ensure integrity of standards and explain the differences and

		changes made in the revised standards before submitting to the NMBA for approval.
10	Submit to the NMBA for final approval	Seek approval of accreditation standards as required by the National Law.
11	Launch revised standards approved by the NMBA	Inform stakeholders that the accreditation standards have been approved by the NMBA and released by ANMAC. Evaluate review and development process with the PRG and stakeholders that participated in the consultation.

Professional Reference Group

ANMAC convenes a PRG to guide the process and oversee project planning, document development, stakeholder engagement and feedback synthesis.

The PRG makes recommendations to ANMAC's Chief Executive Officer based on its understanding and knowledge of key issues likely to affect the review and development of accreditation standards.

PRG membership reflects the diversity of stakeholders affected by the review and the development of nursing and midwifery accreditation standards. Membership includes representatives covering the interests of consumer advocacy, clinical practice, higher education, health service delivery and management, regulation, industrial matters and Aboriginal and Torres Strait Islander peoples.

The role of the PRG is outlined in the Committees Policy and Terms of Reference (Section 6, p. 12).

Consultation paper 1

Consultation paper 1 is developed to provide stakeholders with an opportunity to ask questions, discuss and consider key issues and current accreditation standards. It covers the background, context, purpose and processes of the review. It also evaluates current accreditation standards and addresses key issues in education and health policy pertinent to their revision.

ANMAC and the PRG develops consultation paper 1 by:

1. conducting a literature review to check the evidence base (for example, the methodology for assessing professional competency through the number of hours of workplace experience.)
2. reviewing Tertiary Education and Quality Standards Agency; Australian Skills Quality Authority course accreditation standards
3. evaluating how issues are handled by accrediting agencies nationally (other health professions) and internationally (nurses and midwives)
4. identifying key issues for stakeholder consultation.

Stakeholder consultation

Stakeholder consultation is based on the content of consultation papers and accompanying questions.

ANMAC and the PRG identify stakeholders to invite to provide feedback on consultation papers. ANMAC asks stakeholders to disseminate the consultation papers among their own networks to achieve wide-ranging consultation.

Stakeholders can provide feedback by written submission or through an online survey. These forms of engagement are deemed to be the most appropriate, cost-effective and efficient way to collect feedback. The first two rounds of consultation are open for 30 business days. The third round is open for 20 business days.

Written submission	Online survey
<ul style="list-style-type: none"> • must include the stakeholder's name, phone number and email address • you are requested to respond to the individual questions and not provide a general response • can be emailed to: standardsreview@anmac.org.au or addressed to: Standards Review Australian Nursing and Midwifery Accreditation Council GPO Box 400 Canberra ACT 2601 • will be formally acknowledged by ANMAC on receipt. 	<ul style="list-style-type: none"> • available on ANMAC's website (survey questions are the same as the questions included in the consultation paper) • can include yes/no or ratings-based questions on key issues and free text fields • gives stakeholders an opportunity to suggest improvements or revisions not identified in other questions • has a link to existing standards and consultation paper for ease of reference.

To invite and encourage participation in consultations, an alert is put up on ANMAC's website (homepage) with a link to consultation information.

In the interest of transparency, all written submissions are published on ANMAC's website, unless a stakeholder has asked for confidentiality.

A summary of survey results is also published on the website.

The PRG provides a general response to the stakeholder feedback received in each consultation round. This response is published on ANMAC's website.

Consultation paper 2

After feedback is collated and synthesised by ANMAC and the PRG, consultation paper 2 is developed. This paper contains a progress report on the revision of the standards, a synopsis of issues needing further input or discussion, and the first draft of the accreditation standards.

The PRG develops consultation paper 2, which contains:

1. stakeholder feedback
2. further research on outstanding issues
3. details of outstanding issues needing further consideration by the PRG and stakeholders
4. consideration of how outstanding issues are handled by accrediting agencies nationally (other health professionals) and internationally (nurses and midwives)
5. draft accreditation standards.

Accompanying consultation paper 2 are questions on the content and structure of the draft standards as well as outstanding issues identified in the first consultation.

Final draft of accreditation standards

Following the second consultation round, ANMAC and the PRG develop the final draft of the accreditation standards. The final draft incorporates refinements or amendments the PRG proposes after considering consultation feedback.

The final draft is made available to stakeholders so they can provide final feedback by way of a written submission in the third consultation round.

Submit final accreditation standards to the ANMAC Board

ANMAC submits the accreditation standards to the ANMAC Board with the updated mapping document and a draft covering letter to the NMBA summarising key changes.

The ANMAC Board proposed any further changes to the accreditation standards and, where necessary, asks the PRG for advice and/or a decision.

If the ANMAC Board asks for another opportunity to review changes, the accreditation standards can be distributed for approval out of session.

The accreditation standards are submitted to a professional editor for a plain English review, readability and formatting.

Submit to Nursing and Midwifery Board of Australia for final approval

While ANMAC is responsible for developing accreditation standards, the NMBA is responsible for approving them under Section 47 of the National Law.

ANMAC formally submits the edited revised standards and accompanying mapping document to the NMBA for approval, along with a covering letter. The NMBA has the right to ask for further amendments or revisions, especially with concerns over potential impact on workforce supply.

Launch revised standards approved by Nursing and Midwifery Board of Australia

After ANMAC receives approval from the NMBA, ANMAC develops and implements a communication plan to launch the revised accreditation standards.

Resources for the launch include:

- published accreditation standards
- dedicated page on ANMAC's website
- frequently asked questions.

Correspondence on the launch is sent to all stakeholders involved in the review and development of the accreditation standards.

The review and development process of the accreditation standards is evaluated using an online survey.

Appendix 1



Procedures for the development of accreditation standards

Under section 25 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law), one of the functions of the Australian Health Practitioner Regulation Agency is: 'to establish procedures for the development of accreditation standards, registration standards and codes and guidelines approved by National Boards, for the purpose of ensuring that the national registration and accreditation scheme operates in accordance with good regulatory practice'.

Procedures for the development of accreditation standards

In putting forward a proposal for a new or amended accreditation standard, an accreditation authority must be satisfied that the proposal:

1. takes into account the objectives and guiding principles in the National Law, in particular a), c) and f) of the objectives and a) of the guiding principles. The objectives and guiding principles set out in the National Law at Section 3 (2) and (3) read as follows:

'The objectives of the national registration and accreditation scheme 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; and
- (b) to facilitate workplace mobility across Australia by reducing the administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction; and
- (c) to facilitate the provision of high quality education and training of health practitioners; and
- (d) to facilitate the rigorous and responsive assessment of overseas-trained health practitioners; and
- (e) to facilitate access to services provided by health practitioners in accordance with the public interest; and
- (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 principles of the national registration and accreditation scheme are as follows—

- (a) the scheme is to operate in a transparent, accountable, efficient, effective and fair way;
- (b) fees required to be paid under the scheme are to be reasonable having regard to the efficient and effective operation of the scheme;
- (c) restrictions on the practice of a health profession are to be imposed under the scheme only if it is necessary to ensure health services are provided safely and are of an appropriate quality.'

Australian Health Practitioner Regulation Agency
G.P.O. Box 9958 | Melbourne VIC 3001 | www.ahpra.gov.au

2. meets the consultation requirements in the National Law, namely:

'In developing an accreditation standard for a health profession, an accreditation authority must undertake wide-ranging consultation about the content of the standard.' (Section 46(2))

Accreditation authorities should consult fully on any significant change to standards, or on new standards. The education sector, relevant profession, and governments should be consulted as a minimum, and proposed changes should also be published on the authority's website at the commencement of a consultation process.

3. takes account of 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, and
4. takes into account the [COAG Principles for Best Practice Regulation](#) by considering the following matters:
- a. whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public
 - b. whether the proposal results in an unnecessary restriction of competition among health practitioners
 - c. whether the proposal results in an unnecessary restriction of consumer choice
 - 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
 - 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, and
 - f. whether the Board has procedures in place to ensure that the proposed standard remains relevant and effective over time.

Development, consultation, and recommendation by an accreditation authority

Accreditation authorities must make an assessment of proposed new or amended standards against the COAG principles expressed above. This assessment should be made publicly available including during the consultation process.

It is recommended that the accreditation authority contacts the Office of Best Practice Regulation (the OBPR) at preliminary consultation (and at a later stage/s if requested by OBPR) to seek advice about the regulatory impact of the proposal and whether it is necessary to do a regulatory impact statement (RIS).

Accreditation authorities will provide to the relevant National Board any feedback on regulatory impacts (including advice on the assessment by the OBPR) that has been provided in the consultation process or identified in developing the new or revised accreditation standard. This is to be done when the accreditation authority submits its recommended new or amended accreditation standard to the relevant National Board for approval.

Decision by National Boards

Section 11 of the National Law provides that the Ministerial Council may give directions to a National Board about the policies to be applied by the National Board in exercising its functions under the National Law.

A Ministerial Council direction may relate to matters including a particular proposed accreditation standard, or a particular proposed amendment of an accreditation standard, for a health profession.

However, the Ministerial Council may give a National Board a direction in relation to an accreditation standard or proposed amendment of an accreditation standard only if:

- (a) in the Ministerial Council's opinion, the proposed accreditation standard or amendment will have a substantive and negative impact on the recruitment or supply of health practitioners, and
- (b) the Ministerial Council has first given consideration to the potential impact of the Ministerial Council's direction on the quality and safety of health care.

When a National Board considers, based on the accreditation authority's advice or its own analysis, that the proposed accreditation standard or amendment will have a substantive and negative impact on the recruitment or supply of health practitioners, the National Board will advise the Ministerial Council of its view and the reasons for it so that the Ministerial Council can consider whether any action is required under s.11(4) of the National Law.

The National Board will not make a decision to approve (or not approve) the new or amended accreditation standard until the Ministerial Council provides its view to the Board.



Michael Gorton AM
Chair
Agency Management Committee

Date of issue: 6 November 2014

Date of review: These procedures will be reviewed from time to time as required. This will generally be at least every 3 years.