

5. Your submission

Name of person or organisation

making the submission: Australian College of Optometry

Contact person:

Telephone:

Email:

Information about you

❖ **Are you responding as a/an** (please tick all that apply)

- Education provider
- Peak professional organisation
- Health consumer
- Community member
- Employer
- Government (eg Health Department)
- Government agency
- Health Workforce Australia
- TEQSA
- ASQA/State based VET sector regulatory authority
- Individual practitioner
- Other
–please specify

❖ **What experience have you had with the accreditation council?** (please tick all that apply)

Education Providers -

- The Council has undertaken an accreditation assessment of one or more of our education programs since the introduction of the National Scheme
- The Council undertook an accreditation assessment of one or more of our education programs before the introduction of the National Scheme
- We are currently planning for, or undergoing, an accreditation assessment on one or more of our education programs
- We are new to the accreditation process
- We have been through an accreditation process previously with a different accreditation body previously

❖ **Stage of accreditation assessment** (if you are currently involved in an accreditation process)

- Nearing completion
- Half way
- Just commenced
- Intention to apply submitted
- Planning and preparation underway
- Have sought information or advice from the Council

❖ **Overseas qualified practitioner:**

- Assessment completed
- Assessment nearing completion
- Assessment just commencing
- Have sought information or advice from the Council

❖ **Other stakeholders**

- Have sought information or advice from the Council on other matters
- Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- Involved Council activities eg accreditation or assessment processes
- Little or no direct engagement with Council
- Other – please specify Liaised regarding administration of the OCANZ exam for overseas trained practitioners

Review of Accreditation Council against the Quality Framework for the Accreditation Function

5.1 Governance (Domain 1):

The Accreditation Council effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role.

Attributes

- The Accreditation Council is a legally constituted body and registered as a business entity.
- The Accreditation Council's governance and management structures give priority to its accreditation function relative to other activities (or relative to its importance).
- The Accreditation Council is able to demonstrate business stability, including financial viability.
- The Accreditation Council's accounts meet relevant Australian accounting and financial reporting standards.
- There is a transparent process for selection of the governing body.
- The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s.
- The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements.

Governance – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about governance is primarily at (*refer to pages 4-5 then 23-90 of 369 of the attached PDF report from OCANZ*)

❖ Comments

The ACO is not in a position to comment on this domain.

5.2 Independence (Domain 2):

The Accreditation Council carries out its accreditation operations independently.

Attributes

- Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence.
- There are clear procedures for identifying and managing conflicts of interest.

Independence – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about independence is primarily at (*refer to pages 6-7 then 91-98 of 369 of the attached PDF report from OCANZ*).

❖ Comments

OCANZ procedures and processes in dealing with Conflict of Interest (COI) matters seem relevant and up to date. The ACO has not directly experienced any situations involving COI relating to the internal or external operations of OCANZ.

There is one matter that the ACO would like to bring to the attention of the OBA.

In the most recent renewal of contract, that authorises the ACO Clinical Services Division to manage the OCANZ exam, OCANZ raised an issue of COI relating to the pre-exam workshop delivered by the Professional Development Division. At the time the ACO assured OCANZ that our internal processes guarantee that there is no way that the integrity of the exam is compromised. Unfortunately OCANZ ruled that there was a COI and this course could no longer be delivered. ACO maintains its position that through our clearly documented processes there is no COI and that this course addresses a significant need in delivering skills and knowledge required to provide the Australian community with highly trained and capable optometrists.

5.3 Operational Management (Domain 3):

The Accreditation Council effectively manages its resources to carry out its accreditation function.

Attributes

- The Accreditation Council manages the human and financial resources to achieve objectives in relation to its accreditation function.
- There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.
- The authority can operate efficiently and effectively nationally.
- There are robust systems for managing information and contemporaneous records, including ensuring confidentiality.
- In setting its fee structures, the Accreditation Council balances the requirements of the principles of the National Law and efficient business processes.

Operational management – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about operational management is primarily at (*refer to pages 8-9 then 99 of 111 of 369 of the attached PDF report from OCANZ*).

❖ Comments

The ACO, in its general dealings with OCANZ, has found that the overall operational management of OCANZ is well established. The processes, systems and associated policies seem to monitor the accreditation process well and provide for the implementation of improvement in an effective manner.

In relation to the practical execution of OCANZ day to day operations the ACO has experienced a few matters that are noted here in order to provide an opportunity for OCANZ to review the related processes.

- The ACO has received feedback from its members that OCANZ information, provided on the website, is not always up to date. An example, based on feedback received from overseas trained optometrists who have undertaken OCANZ exam, is the provision of additional information, relevant to preparing for the exam, through their personal contact details. This information was not accessible through the website and therefore could pose a risk to those that rely on this information for their decision making.

- In the most recent interaction of the ACO with OCANZ, relating to the development of the post graduate training in therapeutics, the ACO was advised that the guidelines were old (2004) and were undergoing review. The ACO subsequently was provided with additional information to the guidelines. While this was a good service for the need of the ACO at that time, the information should probably have been available for broader access to the community via the OCANZ website.

It is considered that the provision of complete and timely information through the OCANZ website could further improve the service being provided.

5.4 Accreditation standards (Domain 4):

The Accreditation Council develops accreditation standards for the assessment of programs of study and education providers.

Attributes

- Standards meet relevant Australian and international benchmarks.
- Standards are based on the available research and evidence base.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The Accreditation Council reviews the standards regularly.
- In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.

Accreditation standards - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about accreditation standards is primarily at *(refer to pages 10-11 then 112-215 of 369 of the attached PDF report from OCANZ)*.

❖ Comments

No comment.

5.5 Processes for accreditation of programs of study and education providers (Domain 5):

The Accreditation Council applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers.

Attributes

- The Accreditation Council ensures documentation on the accreditation standards and the procedures for assessment is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. It's policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess professional programs of study and their providers against the accreditation standards.
- There are procedures for identifying, managing and recording conflicts of interest in the work of accreditation assessment teams and working committees.
- The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.
- Accreditation processes facilitate continuing quality improvement in programs of study by the responsible education provider.
- There is a cyclical accreditation process with regular assessment of accredited education providers and their programs to ensure continuing compliance with standards.
- The Accreditation Council has defined the changes to programs and to providers that may affect the accreditation status, how the education provider reports on these changes and how these changes are assessed.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Processes for accreditation of programs of study and education providers – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily in the attached *PDF* report from OCANZ (*refer to pages 12-15 then 216 to 268 of 369*) and is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the Board in the period 1 July 2010 to 1 August 2012.

❖ Comments

Referring to domain 3 where it was noted that at times the information provided on the website is not always up to date.

Our experience in this area is limited and relates to our recent submission of the post graduate training in therapeutics. The ACO has found that the OCANZ provided upfront information relating to the process and the appointment of the assessment team. The ACO was given the opportunity to provide feedback on the selection of members.

The only additional information that would have been of use to us is more details on the expected timeframe of assessment and the expected cost associated to the process.

5.6 Assessing authorities in other countries (than Australia) (Domain 6):

The Board does not require OCANZ to assess authorities in other countries who conduct examinations for registration in a health profession, or accredit programs of study relevant to registration in a health profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.

The Board is satisfied that the objects of the OCANZ constitution allows for OCANZ to take on this function if required by the Board in the future.

❖ **Comments**

Not Applicable

5.7 Assessing overseas qualified practitioners (Domain 7):

Where this function is exercised by the Accreditation Council, the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law and whose qualifications are not approved qualifications under the National Law for the profession.

Attributes

- The assessment standards define the required knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.
- The key assessment criteria, including assessment objectives and standards, are documented.
- The Accreditation Council uses a recognised standard setting process and monitors the overall performance of the assessment.
- The procedures for applying for assessment are defined and published.
- The Accreditation Council publishes information that describes the structure of the examination and components of the assessments.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessors. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess overseas qualified practitioners.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Assessing overseas qualified practitioners – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing overseas qualified practitioners is primarily at (*refer to pages 17-18 then 269-369 of 369 of the attached PDF report from OCANZ*).

❖ Comments

The assessment criteria for the practical components of the examination are well documented. Most criteria are clear and concise with some based around specific actions or tolerances whilst other rely more on the professional opinion of the assessors.

OCANZ do not provide specific assessor guidelines for the practical components of the exams over and above what is outlined in the Candidate Guide and Assessment Sheets. OCANZ do not currently provide training to assessors of the practical components of the examinations. Further guidelines and the provision of assessor training would be beneficial.

5.8 Stakeholder collaboration (Domain 8):

The Accreditation Council works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities.

Attributes

- There are processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, national boards and consumers/community.
- There is a communications strategy, including a website providing information about the Accreditation Council's roles, functions and procedures.
- The Accreditation Council collaborates with other national and international accreditation organisations.
- The Accreditation Council collaborates with accreditation authorities for the other registered health professions appointed under the National Law.
- The Accreditation Council works within overarching national and international structures of quality assurance/accreditation.

Stakeholder collaboration - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily at *(refer to pages 19-20 of the attached PDF report from OCANZ)*.

❖ Comments

The ACO is not in a position to provide comment on this domain.

6. Preliminary conclusion of the National Board about whether current arrangements are satisfactory

The National Board has undertaken a preliminary review of the current arrangements, including an analysis of risks, benefits and costs. The review was based on the submission provided by OCANZ against the Quality Framework for the Accreditation Function as referenced in section 5 above and the Board's experience working with the Council over the last two years.

Proposed decision of the National Board based on a preliminary review of current arrangements including analysis of risks, benefits and costs

Based on the preliminary review, the view of the National Board is that the current accreditation arrangement is satisfactory and that the accreditation function for the optometry profession is to be exercised by the Optometry Council of Australia and New Zealand beyond the period assigned by Ministerial Council. The Board reserved their decision on the period for which the function would be assigned until the conclusion of the consultation process

❖ **To what extent are you in agreement with the preliminary view of the Board?**

Strongly disagree

Strongly agree

1

2

3

4

5

❖ **Please provide comments about the Board's preliminary view**

We thank you for the opportunity to provide our feedback.