

**Feedback on the Draft final report for the
independent review of the accreditation systems
within the national registration and accreditation
scheme for health professions**

**Presented to Professor Michael Woods,
Independent Reviewer**

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Authorised by:

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About the APA

The Australian Physiotherapy Association (APA) is the peak body representing the interests of over 23,000 physiotherapists and their patients. APA members are registered with the Physiotherapy Board of Australia, have undertaken to meet the APA Code of Conduct, are expected to use the latest research in practice and often have further and/or expert qualifications.

The APA sets a high standard for professional competence and behaviour and advocates best practice care for clients. It is our belief that all Australians should have access to high quality physiotherapy to optimise health and wellbeing.

Vision

That the whole community recognises the full benefit of physiotherapy.

Belief

That all Australians should have access to high quality physiotherapy to optimise health and wellbeing.

Purpose

To leverage our global leadership position for the benefit of physiotherapy and consumers.

Independent review of accreditation systems within the national registration and accreditation scheme for health professions

Draft Report, September 2017

The Australian Physiotherapy Association (APA) welcomes the draft report of the independent review, and applauds its focus on both the shared *and* unique aspects of the regulated professions. We strongly support the continued profession based assessment of the health professions as recommended in the report, and the retention of bodies similar in nature to the current professional accreditation councils.

We have chosen to comment several areas in-line with the guidelines for submissions on the report.

Improving efficiency

Our initial submission to the review noted the need to streamline the common elements of courses. To start this process, the APA supports the draft report's recommendation to establish a common nomenclature for accreditation requirements. This could be in-line with the terminology used by the Tertiary Education Quality Standards Authority (TEQSA) terminology.

Close consultation with the physiotherapy profession is needed to ensure that only common terminology is streamlined, and that accreditation retains all appropriate professional terminology.

Likewise, we note that the report recommends that the system would run more efficiently if there were a common set of domains in professional accreditation standards. As noted previously, physiotherapy and a number of the other health professions already have this in place, so these domains could be used as a model across the professions.

We also believe that a common set of assessment procedures and timeframes would be helpful to the universities undergoing assessment processes.

Relevance and responsiveness

Relevance to the needs of the community is an important aspect of the accreditation standards for each profession. Integral to this is the need for culturally safe practice of the health professions. Entry level thresholds for all health professions should require all courses to feature training in this area. While we note that this requirement is mandated in the physiotherapy accreditation thresholds, we strongly support the proposal in the report that this be mandated for all registered health professions.

The report states that a common approach is needed to support inter-professional practice. While we support this contention, we have some concerns about non-physiotherapists supervising physiotherapy students during placement. While we agree that there should be an opportunity for physiotherapy students to work with other health professions during their clinical placements, we do not support a reduction in the requirement for physiotherapists to supervise physiotherapists.

We recommend that a minimum required percentage of physiotherapist supervision practice, with a separate requirement for practice with other health professions to support inter-professional practice.

Reforming governance

The APA supported the strengthening of the Health Professions Accreditation Collaborative Forum (HPACF) as the best of the options proposed in the first consultation paper published earlier this year.

However, we believe that the option put forward in the draft report would could also work well. As a body created specifically to address the shortfalls of the current system, the proposed Accreditation Board would

have the strength of operating within the established National Board system set up by the Australian Health Professions Registration Authority (AHPRA).

Members would be appointed with specific expertise across a variety of health professions and with expertise in accreditation of health systems and of the Australian University system. The APA supports the creation of this Accreditation Board, and believe that it is important that people with expertise in each of the registered health professions be present on the Board.

We support a proposal that establishes an Accreditation Board that utilises secretariat support from AHPRA that:

- Maintains the Health Professions Accreditation Councils' Forum (HPACF)
- Uses the HPACF to play an advisory role to the Accreditation Board,
- Continues to contract the Australian Physiotherapy Council to accredit physiotherapy courses in the short to mid-term, and provides them with an opportunity to do so in the long term,
- Has closer ties with TEQSA and the bodies engaged to accredit the professional component of courses,
- Has a structure which allows for closer ties with ACSQHC (Australian Commission on Safety and Quality in Health Care),
- Has a physiotherapist included as a member,
- is supported by AHPRA using existing funds from the current registration boards, apportioned to workload,
- supports the physiotherapy profession to continue to own its own professional standards of practice, and
- the bodies appointed to conduct accreditation continue to develop accreditation standards.

Reforming governance – Consideration of the unregistered professions

The APA does not believe that the inclusion of accreditation functions for unregistered health professions is appropriate for the NRAS. Accreditation is closely linked with Registration, and would blur the boundaries between registered and unregistered professions in the eyes of consumers. We are concerned about this for a number of reasons.

The model would operate under vastly different conditions for that of the registered professions. It would not be likely that there would be an independent accreditation council/committee to do the work associated with accreditation for the registered professions, so consideration as to how this would affect the process should be maintained.

The APA supports a model that does not increase registration fees for the registered professions, and it would be likely that some cross subsidization would occur to support the less structured work of accrediting non-registered professions. Furthermore, AHPRA would be burdened with the cost of entering into agreements with unregistered professions, as the National Boards do not enter into commercial arrangements. This is done by AHPRA on behalf of the Boards.

We are also concerned about the blurring of boundaries for consumers, health professionals and students entering courses. Accreditation by an Accreditation Board supported by AHPRA would enable unregistered health professional to legitimately claim that they hold a degree accredited by AHPRA. This would risk causing confusion for students entering these degrees, and for the public accessing health providers who had completed a degree accredited by the health regulator.

Specialist colleges and postgraduate medical councils



There is a pathway for physiotherapists to obtain Fellowship of the Australian College of Physiotherapy (ACP) which leads to use of the title of specialist physiotherapist in a specialist field. This program is underpinned by the CanMeds Framework and competencies are well recognized within the physiotherapy profession.

We are confident that if Fellowship of the ACP led to inclusion on a new specialist register of physiotherapists with the Physiotherapy Registration Board that this pathway could easily be adapted to meet the requirements set out in the draft report.

Setting national reform priorities

The APA believes that a co-ordinated approach to aligning the NRAS to national health workforce reform directions is long overdue, and we support the initiatives outlined in these recommendations.

To discuss this submission further, please contact James Fitzpatrick, General Manager, Professional Development and Member Groups at james.fitzpatrick@physiotherapy.asn.au.