PROFESSIONAL ACCREDITATION

Mapping the territory

FINAL REPORT

February 2017

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ISBN: 978-1-76051-160-9

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1 EXECUTIVE SUMMARY

The Department of Education and Training commissioned PhillipsKPA to survey and characterise the extent and scope of professional course accreditation practices in Australian higher education. Professional accreditation was defined as either legal or professional association requirements for the accreditation of courses in higher education by a professional association to enable graduates to practice or be registered to practice in Australia. It also encompassed situations where a professional association seeks to influence the design or delivery of higher education courses without strict or enforceable impacts on the ability of graduates to practice in Australia. The focus of the brief was on higher education so the role of ASQA and professional accreditation in the Vocational Education and Training sector are not covered in this report.

It is important to emphasise that, consistent with the terms of reference, the project is NOT an evaluation of the practices of individual accreditation agencies or any other body. The report also does not make recommendations for action. These were not part of the brief for this review but it was expected that options for improvement would be identified.

Work undertaken by Universities Australia and Professions Australia to develop a joint statement of principles for professional accreditation and any relevant policy work by other stakeholders was included in the investigation.

This report is intended to inform work being undertaken by the Higher Education Standards Panel to provide advice to the Minister for Education and Training on the impact of professional accreditation on Australian higher education and opportunities that may exist to reduce regulatory burden for higher education providers.

1.1 STRUCTURE OF THE REPORT

Information contained in this report was derived from two main sources: a literature review reported in Chapter 3, and consultation with accrediting bodies and higher education providers (processes summarised in Chapter 2). The findings from both sources are highly consistent and mutually reinforcing. There is little doubt about the major issues surrounding professional accreditation, the characteristics of good practice and the impacts, both positive and negative that are evident to all stakeholders.

Chapters 4 and 5 provide a classification of accreditation types and describe accreditation practices. Chapter 6 describes the views, both positive and negative, of accreditation agencies and higher education providers. Elements of good practice, emerging trends and suggestions for improvement are summarised and discussed in Chapter 7. Chapter 8 suggests options for improving the processes of accreditation and specifically addresses reducing the regulatory burden and fostering innovation.

The appendices describe the information sought, the institutions that responded and provide summary tables of analyses of published accreditation standards and guidelines.

1.2 SUMMARY OF FINDINGS

1.2.1 Accreditation processes

Virtually all accreditation of mainstream professions follows a similar pattern in its published documentation, although details in the process vary and there is a significant range in the level of guidance given. All identify professional competencies or core bodies of knowledge against which graduates must be assessed. Virtually all accreditation agencies develop their standards through a consultative process with academics and practitioners. The vast majority claim to be adopting a learning outcomes approach and have evolved less prescriptive criteria for the inputs and methods by which providers assist students to achieve learning outcomes. In areas where public safety is pre-eminent there is a greater degree of prescription surrounding learning in real-life situations.

Review of the published documentation of accrediting bodies reveals that the majority are aware of TEQSA, the AQF, the Higher Education Standards Framework, and the regulatory environment for higher education, some in more detail than others, and a similar statement can be made for awareness of the higher education context and processes of academic governance and internal quality assurance. Most agencies are in compliance with the general principles for good accreditation practice, at least as far as their published material reveals. The area of most apparent deficiency relates to the definition of panel scope and training of panel members. This is consistent with views expressed by both providers and accreditors that review panel members sometimes exceed or deviate from the scope of the published standards for review.

Some agencies adopt a light touch, choosing to accept TEQSA registration as a mark of institutional quality – this approach is gaining ground as awareness of TEQSA spreads and processes are reviewed. However, a smaller but significant number impose demanding information requirements that can be described as excessive and/or duplicative. Their motivation seems to be in pursuit of rigour, reputation and public safety rather than exclusivity and it is likely that they have not had the benefit of peer interaction in developing their standards.

Virtually all agencies claim to encourage flexibility and innovation and most major agencies actively interact with providers to achieve these ends. In general providers concur with this claim and the problems that are reported are focused in a few areas that are amenable to improvement.

1.2.2 Governance and management of accreditation

We identified approximately 100 agencies that undertake formal accreditation on behalf of the professions. Accrediting agencies are in most cases independent corporate entities, in other cases they are committees of professional associations. All are self-regulating except the 14 health professions that are subject to the National Registration and

Accreditation Scheme for health professions, and even they enjoy a high level of autonomy within the terms of the legislation. Only 50 per cent of agencies belong to a group of peers such as Professions Australia or the Australian Health Professions Accreditation Councils Forum. The remainder operate essentially independently without formal access to peer interaction. Large and well established professions such as medicine, nursing, engineering and accounting are quite advanced in their philosophies and methods. Conversely, some smaller groups are deficient in their recognition of modern trends and in their approach to due process. Some smaller or newer professions lack the critical mass or resources to maintain a fully professional infrastructure that would allow them to be more responsive to the evolution of accreditation practice. Unfortunately these less experienced and less well-resourced groups also tend to be the ones who are not closely engaged with peer groups.

Since professional accreditation agencies are essentially self-regulated their formation and proliferation is equally self-regulated. The success of newly formed accreditation agencies depends on their capacity to convince providers that their endorsement of a program will add to the attraction of students. It is, in effect a market. As an accrediting agency gains traction and more providers 'sign up' those who have not eventually become less competitive and feel the pressure to also seek its seal of approval. Ultimately each provider must decide when the demands or costs of accreditation with any given agency exceed the potential benefits. Providers are not necessarily powerless in the negotiation and several do decide to walk away from accreditation agencies whose demands they are not prepared to accept. On the other hand, in some professions, especially those in which graduation from an accredited course is essential for national registration, the power imbalance between providers and accreditors is open to potential abuse. One example was provided where the accrediting body essentially charges two sets of accreditation fees to accredit two Bachelor degrees, the only difference between the degrees being the time of year of student intake – at the beginning of the year or at mid-year. There is apparently no avenue to appeal this inexplicable imposition.

While there is no evidence of systemic abuse of the process or manipulation by accrediting agencies to restrict entry to the professions examples are given of practices which have had this effect, for example imposition of minimum English language requirements for entry to accredited programs which exceed those required by the provider for admission to the degree.

A few professions continue to register or recognise practitioners on a state or territory jurisdiction basis (law, architecture, teaching, veterinary science). While all have made some progress towards developing national standards and processes for accreditation there is considerable variation in the level of success achieved. Inconsistency in the application of nationally agreed protocols in these professions is a cause of considerable difficulty for many providers. In all cases the professions and the providers are acutely aware of these problems and are working towards their resolution, a task which is slow and difficult given long held entrenched traditions and political contexts. Accreditation of initial teacher education in particular receives adverse comment from providers relating often to the decisions of individual jurisdictions' teacher regulatory authorities to add their own criteria and interpretations that go beyond the agreed national accreditation

framework. The high political and industrial stakes surrounding initial teacher education confound investigation and resolution of the apparent difficulties in this report, and exceed by far the terms of reference of this overview. It should be noted that the problems raised in relation to initial teacher education are acknowledged and that work is currently in train to address the difficulties. Comments we received on initial teacher education are summarised in Chapter 5.

In summary, for the most part accreditation agencies are unregulated bodies accountable principally to the professions they represent. There is no nationally endorsed code of practice or oversight of accreditation practices or outcomes and virtually no avenues for independent appeal of decisions. It works as well as it does because of the shared interests of the accreditors and the accredited in producing high quality graduates and professionals, maintaining their own reputations and protecting the safety of the public. This is not to deny that there are areas where interests and points of view conflict, but in the vast majority of cases those conflicts arise from sincerely held positions and would be amenable to resolution if accreditation were underpinned by a nationally agreed system of accountability and due process.

1.2.3 The biggest problems - what respondents told us

In general, professional accreditation is valued by all stakeholders. Most accreditors and education providers stress the value of accreditation as a stimulus to self and peer review, a benchmarking process and an opportunity for continuing quality assurance and improvement. The impact of professional accreditation on providers varies considerably depending on the accreditation body involved and on the total number of professional accreditations that providers seek. Virtually all agree that, if conducted in an appropriate and transparent manner, accreditation is a beneficial process well worth the effort expended.

However, the aggregate effect of coping with idiosyncratic and excessive or unreasonable demands for information and compliance from some accrediting agencies is significant, expensive and problematic. This is particularly true for smaller institutions and for non-self-accrediting providers with smaller budgets and staff profiles who have the added layer of course accreditation by TEQSA.

Specific problems that were commonly cited by providers include the regulatory and financial burden, the wide variation in format and type of information required, inappropriate intervention in institutional autonomy, lack of transparency and due process and poorly prepared accreditation panels. A desire for a more streamlined approach and for greater levels of understanding by professional bodies of the requirements for registration and accreditation and the Higher Education Standards Framework is consistently expressed.

There appears also to be a problem related to English Language requirements imposed by some professional bodies on international students who have graduated from Australian professional programs. The problem and its impact on students is discussed in Chapter 6, Section 6.4.

Specific problems that were cited by professional accreditation agencies include small professions sometimes having difficulty in providing assessors or reviewers who do not appear to have a conflict of interest, submissions that are presented as "sales pitches" and providers that use accreditation consultants to prepare accreditation documentation, and thus do not get much value out of accreditation.

The financial burden of accreditation is large, especially for those providers who have a high proportion of technical and health professions degrees. Direct costs in terms of fees to the agencies for initial accreditation, monitoring and re-accreditation and for site visits as well as the indirect costs of the considerable academic and administrative staff time needed to compile large, detailed and usually hard copy reports can add up to hundreds of thousands of dollars in any given year. On the other hand accreditation agencies claim that they subsidise the process from other fees and income sources or at least only recover their costs. No agency admits to making a profit from accreditation, yet it continues to be a major financial imposition on both sides. The inevitable conclusion is that the process needs to be more efficient and less labour intensive. Suggestions to increase efficiency are detailed below and in Chapters 7 and 8.

1.3 SUGGESTIONS FOR ACTION

Aside from the inherent duplication of effort created by multiple accreditation processes a common factor underlies all of the difficulties expressed by providers: the lack of a standard or code of practice to which all accreditation agencies can be accountable. The lack of a formal external standard of accountability means that there is no avenue for mediation of intractable disputes that relate to the processes of accreditation. In a few cases providers have chosen to forgo accreditation rather than capitulate to what they see as unreasonable demands, thus potentially disadvantaging their students.

Respondents offered many suggestions for improvement which are detailed in Chapter 7. They encompass suggestions for reducing duplication, improving accreditation practices, enhancing communication, proactively supporting innovation, benchmarking and better coordination with TEQSA. The suggestions in Chapter 7 provide a potentially helpful checklist for the development of a national code of practice and monitoring system, the fundamental essential component for any improvement.

As noted above, while recommendations for action were not part of the brief for this review it was expected that options for improvement would be identified. Those options are offered with an awareness of the intricacies of maintaining the independence of professional bodies and of academic institutions to set and maintain professional standards, while also ensuring adherence to appropriate standards of accreditation practice. Chapters 7 and 8 provide background to these suggestions.

1.3.1 Improving the governance and accountability structures for professional accreditation

1.3.1.1 Development of a nationally agreed code of practice and guidelines for accreditation

In the United States of America accreditation agencies are themselves accredited voluntarily, by the Council for Higher Education Accreditation (CHEA) and/or the US Department of Education. CHEA is an association of 3,000 degree granting institutions and recognizes 60 institutional and program accrediting organisations. In the absence of a discernible appetite for such a regime in Australia at this time the work already commenced by Universities Australia and Professions Australia should form the basis of a model of self-regulation. Stakeholders generally supported the idea of a nationally agreed protocol for good practice principles and practices for accreditation. Such a protocol would need to be established through wide consultation, and promulgated as an "ideal model" for all accreditation agencies. This national protocol could be used as a reference point for mediation of intractable disputes by a designated body – perhaps TEQSA's remit could be extended to allow a role in mediating such disputes, or perhaps a specific mediation committee of UA/PA could be instigated to perform the role. It should specifically incorporate eligibility criteria, terms and code of conduct for review panel members. Ideally all accreditation agencies would be members of an organization such as Professions Australia or the regulated Health Professions Accreditation Councils Forum which could support and monitor compliance with the protocol.

The Australian Health Professions Accreditation Councils' Forum already serves as a model for this form of peer regulation and its experiences are instructive. With only 11 current members the Forum has achieved some agreements on common interests but to date has not achieved any significant progress on implementing a common core of accreditation criteria and processes even though the Councils operate under common legislation. The Forum does have a document that outlines the core of accreditation standards for the regulated health professions[1]. Since 2015, the Forum has also been working on identifying and developing agreed principles for areas which are important but not necessarily well covered in standards (for example interprofessional education, safe use of medicines).

These efforts, however, highlight the potential difficulty in aiming to bring 100 plus agencies under a common umbrella.

Those professions that are still registered in individual jurisdictions will continue to present problems unless an overarching imperative to comply with national protocols becomes evident. They may each require individual approaches to speed the process.

Difficulties notwithstanding, there is broad, virtually universal support for the development of good practice principles and guidelines. The Universities Australia/Professions Australia process has strong support as the foundation for further development.

1.3.1.2 Development of a "Plain English" guide to accreditation responsibilities

[1] See *Essential Elements of Education and Training in the Registered Health Professions*: www.healthprofessionscouncils.org.au/files/f8ccd60527191bac35298ca110a8d5962f12b768_original.pdf

Benefits would be realised by a concerted attempt to map at a broad level the extent of overlap between the Higher Education Standards Framework and professional accreditation standards. At the very least such a process which has been conducted by the Health Professions Accreditation Councils' Forum could ensure that the wording of standards used by accreditation bodies is not inconsistent with the wording of standards applied by TEQSA to the registration of providers. The objective of such mapping would be to reassure professional accreditation bodies that input and process issues at an institutional level are accredited by TEQSA, thus freeing up professional accreditation to concentrate on the processes and inputs that are necessary to produce specified professional outcomes. For example, some accrediting bodies concern themselves with university governance, facilities management, general student support, academic quality assurance and assessment integrity – all issues which are critical to TEQSA's decision to register a provider. Other accrediting agencies take the approach that since a provider is registered by TEQSA such issues can be assumed to be up to the required standards.

A plain English guide, perhaps in the form of a three column table, would be a welcome addition to a code of practice and guidelines. In spite of TEQSA's excellent and well - received briefing sessions there is widespread lack of clarity about which agencies have a legitimate interest in which aspects of professional education. Although accreditation agencies themselves appear to understand their roles in relation to others and this is reflected in their documentation there is significant reported experience to indicate that this understanding is often not shared by expert reviewers or panel members, or indeed by- many academics. There is a need to differentiate TEQSA's regulatory criteria for registration of providers from course accreditation criteria that are properly the concerns of accreditation agencies. It is also necessary to differentiate the responsibilities of self-accrediting institutions in internal course accreditation and also TEQSA's equivalent role for non-self-accrediting institutions.

As part of the suggested plain English guide common terminology could be defined so that terms defining critical data requirements (eg retention, categories of staff) are consistent and the format in which they are provided can be consistent. This could extend to better definition of the process for risk assessment and sharing of approaches between TEQSA and accrediting agencies. Regular surveys of accreditation practice could monitor progress and assist with continuous improvement

1.3.2 Reducing duplication and increasing efficiency

Any approaches to reducing duplication will require some form of leadership and some incentives. A number of possibilities have been suggested, all of which have a cost attached.

1.3.2.1 Support for a project to accelerate development and adoption of risk assessment approaches

There is broad interest in refining a process to assist in identifying high and low risk programs and providers. Accrediting agencies that have an MOU with TEQSA are already sharing information to assist in this process. However, it is unlikely that all accrediting agencies will enter into a formal MOU with TEQSA to allow such sharing of information.

In that case it will be necessary to develop through consultation, refine and promulgate a set of indicators and tools that can be used efficiently for routine monitoring of programs after their initial accreditation. This project could be led by the UA/PA consortium but will be relatively labour intensive and require specialist technical expertise.

Additionally a mechanism could be considered to enable accreditation agencies without an MOU to access regulatory and governance information already collected by TEQSA, with the provider's approval, thus eliminating the necessity to provide the same information in different formats.

Most accreditation agencies currently conduct an initial accreditation which is sometimes only provisional, followed up by annual monitoring reports and full re-accreditation after a set period from 3–7 years. This contributes significantly to workload and costs on both sides that could be reduced if a system were developed that clearly defined major changes in courses or institutions that should prompt a full re-accreditation process. Currently some innovation is being hindered by the expense that is involved in seeking re-accreditation often simply for a change in teaching practice or practicum location that is in line with modern trends.

1.3.2.2 Support for a project to develop universal online reporting capability

Currently many accreditation agencies require submission of multiple copies of soft or even hard copy reports each presented according to their own idiosyncratic format. The net result is that often the same information has to be reformatted and presented multiple times on multiple forms to different agencies. Many agencies have moved or are moving to online submissions and a few even indicate a willingness to accept documents that have already been submitted to TEQSA. These are, however, in the minority.

It should be possible (although admittedly not easy) to develop an online software tool similar to the one used by TEQSA for course accreditation that could be adopted by all accrediting agencies and modified beyond a certain common set of information to allow for input on specialised professional standards and criteria. The "core set" of information could build on the core data sets and terminology developed through the actions suggested above. The fact that something like this has not yet been developed by the AHPRA agencies gives reason for caution. It is worth noting, however, that the Australian Medical Council has entered a contract with a US based vendor to provide a new accreditation management system with this functionality. The cost is high. The AMC's own experience of online submission to a recognition agency using this sort of process is that it is time consuming and frequently inflexible, and does not take account of the fact that the organisation submitting may be using the accreditation submission for other purposes. The capacity of the education provider to present information in a specific way, relating to their structure or unique features is limited[2].

However, while one can also envisage some resistance to this from agencies that have invested heavily in their own formats this is one area in which a unified approach to

[2] Personal communication from the Australian Medical Council

investigating the feasibility from Universities Australia and the Council of Private Higher Education (COPHE) and the Australian Council for Private Education and Training (ACPET) could bring some pressure to bear.

1.3.2.3 Support for improved sharing of resources

Regular briefings and forums such as those held by TEQSA in the run-up to implementation of the revised HESF are an important opportunity to ensure that professional accreditation bodies are apprised of current national and international priorities and approaches to accreditation. UA and PA could also extend their engagement in establishing good practice frameworks to more far-reaching consultation and discussion forums.

Such events should share exemplars and stress the benefits of accreditation for assisting flexibility, innovation, benchmarking, future-proofing and continuous self-assessment and quality improvement. Specific attention to the issues around English language testing of international graduates of Australian programs should form part of this program of shared expertise and experience, enlisting where necessary English Language testing expertise. While the need for compliance with established criteria will remain important its relative place in the scheme of things needs to be continually re-assessed and discussed in the context of broader objectives such as continuous quality improvement and innovation.

There is considerable scope for shared approaches to training and for greater interaction of assessors across disciplinary boundaries. Formulation of clear national standards for best practice in accreditation could encourage these developments which should also emphasise training academics about their role in accreditation and their responsibility to understand emerging trends in pedagogical practice. Specific interventions may be needed to assist those professions that continue to operate with state/territory rather than national oversight.

2 BACKGROUND AND APPROACH

2.1 CONTEXT

The Department of Education and Training commissioned PhillipsKPA to survey and characterise the extent and scope of professional course accreditation practices in Australian higher education. Professional accreditation was defined as either legal or professional association requirements for the accreditation of courses in higher education by a professional association to enable graduates to practice or be registered to practice in Australia. It also encompassed situations where a professional association seeks to influence the design or delivery of higher education courses without strict or enforceable impacts on the ability of graduates to practice in Australia.

The brief covered a range of dimensions, including the scope of professional accreditation arrangements, the practical impact on institutional operations, the perceived advantages and disadvantages (from the point of view of institutions, the profession, employers, and students), and the effect of professional accreditation on innovation in course design. It also required consideration of how professional accreditation requirements interact with the requirements of the Higher Education Standards Framework and the impact on Australian course design of international professional recognition requirements.

Work undertaken by Universities Australia and Professions Australia to develop a joint statement of principles for professional accreditation and any relevant policy work by other stakeholders was included in the investigation.

This report is intended to inform work being undertaken by the Higher Education Standards Panel to provide advice to the Minister for Education and Training on the impact of professional accreditation on Australian higher education and opportunities that may exist to reduce regulatory burden for higher education providers.

2.2 TERMS OF REFERENCE

The terms of reference were to:

- describe the nature and scope of professional accreditation practices in Australia;
- assess the impact on institutions of professional accreditation requirements;
- characterise and assess the interaction of professional accreditation requirements with both TEQSA and self-accrediting institution course accreditation requirements;
- describe any emerging trends in professional accreditation;
- outline the impact of international professional recognition; and

- note any opportunities identified where either professional-, TEQSA- or self-accreditation activity could be modified or better leveraged to streamline, remove duplication from or otherwise reduce regulatory burden in course accreditation processes, without negatively impacting on the quality of course design, course delivery or the standing of qualifications.

2.2.1 Deliverable

A report that includes:

- an evidence-based description of the scope of professional accreditation requirements in Australia vis-à-vis higher education provision in Australia;
- identification of the advantages and disadvantages of professional accreditation (from the point of view of higher education institutions, professions, employers, and students);
- advice on the benefits and challenges of professional accreditation for higher education providers, both domestically and internationally; and,
- advice on opportunities to reduce regulatory burden associated with professional accreditation of higher education courses.

2.3 APPROACH

The project was undertaken between July and December 2016.

2.3.1 Desk research

An initial master list of professional and accreditation agencies with which higher education providers typically interact was compiled from a range of sources including professional and academic networks and universities' websites. This initial list numbered over 100. The websites of each of these agencies were consulted to identify those which conducted accreditation or review of courses in some form or another. Several whose brief was to serve only as associations providing services to individual professional members were eliminated from the master list. Individual jurisdiction-based bodies that accredit courses in law, architecture, veterinary sciences and initial teacher education were also eliminated since all of them subscribed in some form to national standards and processes which were included in the analysis. It should be noted however, that general agreement to move towards a common national system is not yet realized in actuality and in some professions such as Law and Initial Teacher Education is much further from achievement than in others. A desktop review of accreditation policies and requirements was undertaken for the list of 100 agencies thus compiled. A spreadsheet of those agencies is provided in Appendix 1. The list includes international agencies whose accreditation is commonly sought by Australian course providers.

A number of consortia have developed lists of principles and good practice guidelines for professional accreditation. These include the Joint Statement of Principles for Professional Accreditation developed by Universities Australia and Professions Australia, and the principles developed by the Health Professions Accreditation Councils' Forum and the standards and procedures developed by the Australian Institute for Teaching and

School Leadership. These have much in common and were used as the basis for analysis of published accreditation standards and processes for "compliance" with good practice. This analysis is provided in Appendix 2. A literature review was also conducted to identify relevant activities and sources both nationally and internationally (Chapter 3).

2.3.2 Consultations

A list of questions was developed for accreditation agencies and a separate list for higher education providers. These questions were derived from the terms of reference for the review and are presented in Appendix 3.

The questions and background to the project were posted on the Department of Education and Training website. They were also included in email requests directed to:

- Universities Australia
- Professions Australia
- Australian Council for Private Education & Training (ACPET)
- Council of Private Higher Education (COPHE)
- Australian Health Professions Accreditation Councils' Forum
- All university Vice Chancellors
- All Councils of Deans
- All accrediting and professional agencies that had been identified as involved in course approvals/accreditation.

A number of meetings and interviews arose from the request for input and written responses were received and analysed. A list of respondents is provided in Appendix 4. Interviews and consultation were also arranged with:

- TEQSA senior staff involved with liaison with professional bodies
- Co-chairs of the Universities Australia/Professions Australia working party on guidelines for professional accreditation
- Universities Australia's Health Professional Education Standing Group
- Professions Australia
- DVCs Academic group
- Members of the Australian Council of Deans of Education
- Selected accreditation and registration bodies.
- The Independent Review of Accreditation for the National Registration and Accreditation Scheme for the regulated health professions.
- Australian Institute for Teaching and School Leadership

2.3.3 Reporting

A draft report was considered by the Higher Education Standards Panel and it was determined that a consultation draft would be circulated to a limited number of

providers by the Chair of the Higher Education Standards Panel seeking feedback prior to finalization of the report.

3 LITERATURE REVIEW

3.1 THE CONCEPT OF "PROFESSIONAL ACCREDITATION"

There is no formal, legislated definition of a "profession" in Australia. The Australian Council of Professions (Professions Australia) uses a widely cited definition which identifies a set of distinguishing characteristics:

> A profession is a disciplined group of individuals who adhere to ethical standards and who hold themselves out as, and are accepted by the public as possessing special knowledge and skills in a widely recognised body of learning derived from research, education and training at a high level, and who are prepared to apply this knowledge and exercise these skills in the interest of others. (Professions Australia, 2016)

This definition does not specifically include a requirement for a process of accreditation, except perhaps indirectly through the reference to "a disciplined group of individuals". Other sources are more explicit that some form of enforced entry requirements and/or standards are key distinguishing features of a profession. Drawing on Hoyle & John, 1995 and Belfall, 1999, Lester, 2009 identifies that critical elements of professionalism include:

- The possession or use of expert or specialist knowledge;
- The exercise of autonomous thought and judgement;
- The acceptance of responsibility to clients and wider society through voluntary commitment to a set of principles; and
- The presence of an association or governing body that sets entry requirements and exercises disciplinary powers.

The final point here – the presence of body that sets and enforces entry requirements – is a direct reference to some form of professional accreditation or registration. Indeed, the existence of a recognised body with an accreditation/registration function is arguably the most objective and demonstrable evidence that an occupation regards itself as a profession. As Lester observes, "the idea of *being professionally qualified* is … virtually synonymous with being accredited by a professional or regulatory body" (Lester, 2009, p.226).

All definitions of "profession" highlight the possession of expert or specialist knowledge and skills. In its definition Professions Australia goes on to state that the special knowledge and skills of a profession are "derived from research, education and training at a high level". This draws a close connection to higher education as a principal source of the knowledge and skills required for professional status. It is the intersection between higher education providers and professional accrediting bodies that is the primary focus of this report.

It is nonetheless important to note that higher education is only one route to professional recognition, albeit the most common one. A review of the attainment of professional status in various countries for the Australian Library and Information Association (Hallam, 2013, p. 4, 5) observed that:

- There has been demand for an expanded spectrum of professional eligibility options that encompass a range of employment backgrounds and career pathways with wider eligibility requirements that focus more on the applicants' practical experience, rather than their academic achievement.
- There is a variety of qualification routes stipulated by different professional bodies to recognise prior learning as a result of employment in an allied professional field, mature entry and/or existing work experience.

Hallam (2013) notes that a study of 16 professions in the UK with "reasonably well-defined routes to qualified status" (Lester 2009, p.230) found that three professions had a single route, six had 2-3 routes, five had 4-5 routes and two had 6-7 routes. However, the actual incidence of professional status achieved by alternative routes was found to be quite rare, with 95% of entrants to a chosen profession holding a degree and/or a postgraduate qualification. The same study observed that the increasing complexity of professional work and "the need for self-management and leadership" were drivers of the dominant emphasis on higher education qualifications as the principal basis for entry to the professions (Lester, 2009, p.231).

The dominant role of higher education qualifications means that accreditation of higher education courses is a central function of the organisations involved in the regulation of entry to the professions. Accreditation is typically closely linked with professional registration processes: successful accreditation is an endorsement that an academic program produces graduates who can meet registration standards for the profession (Ingvarson et al, 2006).

Accreditation has been defined in various ways. Some definitions emphasise the perspective of the higher education provider, e.g. "accreditation is the process by which an institution (e.g. a university) convinces the public and other institutions of its program's soundness and rigour" (Wilson & Youngs, 2005). More commonly, accreditation is defined in terms of its process and objective, e.g.:

- "Accreditation is the process to determine and to certify the achievement and maintenance of reasonable and appropriate national standards of education for professionals". (Association of Accrediting Agencies of Canada)
- "Accreditation is the formal endorsement that the graduates from a program are deemed to possess the competencies required to progress toward registration as an architect". (Architects Accreditation Council of Australia)
- "Accreditation has been defined as the process by which a non-governmental or private body evaluates the quality of a higher education institution as a whole or of a specific educational program in order to formally recognise it as having met certain pre-determined minimal criteria or standards (Vlăsceanu, Grünberg & Pârlea, 2007, cited in Hallam, 2013).

In their recently released Joint Statement of Principles for Professional Accreditation, Universities Australia and Professions Australia (2016) made a distinction between "professional accreditation" and "academic accreditation" as follows:

> Professional accreditation of university courses of study is intended to ensure that a course of study meets essential criteria in the training and education of its students in the relevant professional discipline, and that graduates from that discipline achieve the professional competencies and learning outcomes necessary for entry into the relevant level of professional practice.
>
> Academic accreditation refers to the evaluation of a course of study (either by TEQSA or by a self-accrediting provider such as a University) against course requirements specified in the Higher Education Standards Framework. (p2)

Reviews and descriptions of professional accreditation in Australia often draw a distinction between professional accreditation for the regulated professions (e.g. medicine, nursing, psychology and architecture) and for the non-regulated professions (e.g. engineering, accountancy). Governments regulate some professions where they wish to assure public safety and designate authority for bodies to accredit professions. In unregulated professions, professional associations may establish an accreditation function as part of their wider professional services and operations.

Regulated professions require a person to gain registration or some other form of licence before they can practise and use the professional title. In unregulated professions, the professional body does not control use of the appellation, e.g. "accountant" or "engineer", but may control use of terms for membership categories, e.g. "Certified Practising Accountant" and may provide admission to more advanced professional certification levels, such as "Chartered Engineer".

3.2 PROFESSIONAL ACCREDITATION STRUCTURES

Accreditation as a process of assuring the quality of professional preparation programs has a long history. Ingvarson et al (2006) note for example that accreditation was one of the major recommendations that came out of the Flexner Report in the 1920s that led to major reforms of medical education in the US.

For most professions in Australia, there has been a pattern over time of state and territory registration authorities delegating their accreditation function to national agencies. This has not always been a straightforward process and a range of different organisational structures have emerged, but national accreditation arrangements are now the norm rather than the exception across the professions in Australia (Ingvarson et al, 2006).

Of particular note is the National Registration and Accreditation Scheme for the health professions which commenced operation on 1 July 2010, and 18 October 2010 in Western Australia. Before then each State and Territory had its own system for

registering and regulating health professionals, meaning there were 97 different health practitioner boards across the eight jurisdictions (Snowball, 2014).

International accreditation bodies are also growing in significance as entrants to professions increasingly demand qualifications that are internationally recognised and universities seek to attract overseas students to their professional preparation programs. In some fields such as engineering this takes the form of reciprocal recognition arrangements between corresponding professional bodies in different countries. In other professions such as business and accounting there are international accreditation agencies offering forms of professional accreditation with their own compliance requirements in addition to those of the national bodies.

3.3 THE PURPOSES AND BENEFITS OF ACCREDITATION

3.3.1 Overview

The proponents of professional accreditation identify a wide range of purposes or goals for the process. These have been summarised as being to:

- promote and advance the profession through the development of better-educated practitioners
- foster a co-operative approach to graduate and postgraduate education between industry, government and educators to meet the changing needs of society
- signify that a program has a purpose appropriate to higher education at a professional level and has resources and services sufficient to accomplish its purpose on a continuing basis
- provide a credible, independently verifiable method to differentiate accredited programs from other non-accredited programs which may not adhere to important professional standards
- provide an opportunity to the educational institution for improvement and self-analysis, and to show a commitment to continuous improvement
- check that the program content is current, technically accurate and taught by appropriately qualified staff working in conjunction with the appropriate support staff. (Carrivick, 2011, p.486-7 cited in Hallam, 2013)

In the Joint Statement of Principles for Professional Accreditation, Universities Australia and Professions Australia (2016) stated that professional accreditation of Australian university courses serves several purposes, including:

- serving a public good through which stakeholders – the public, students, graduates, employers, higher education institutions, government, professional associations and professional accreditation bodies – can be assured that graduates of an Australian university course meet the criteria and standards for entry into the relevant level of professional practice in a specific professional discipline;

- providing an independent quality assurance process for registration under government legislation and/or membership of a professional association that a university course meets the criteria and standards for entry into the relevant level of professional practice in a specific professional discipline;
- encouraging adherence to a code of ethics or behaviours for the professional discipline;
- aiding student and graduate mobility both within Australia and overseas, including potentially improving ease of access to further study or employment in Australia and overseas. (p3)

It has been noted that these purposes form two broad and inter-related reasons for professional accreditation:

> The first is to serve the public interest and provide a safeguard that a qualification from a university provides graduates with the knowledge and skills required to practise safely and competently. Accreditation in this sense is a summative assessment. The second reason is to support processes for evaluation and improvement, both through internal assessment and through comparison with other programs and research on effective practice and professional preparation, while encouraging innovation and diversity. In other words, accreditation is a powerful lever for formative assessment for improvement. (Ingvarson et al, 2006)

These same two core purposes – to ensure a minimum level of quality and to provide an incentive for quality improvement – were observed by an investigation into accreditation practices conducted by the Professional Association Research Network (PARN) in the UK. The PARN study, involving respondents from 28 different UK professional bodies found that the primary reasons for undertaking accreditation were to maintain a minimum standard (35%) or to raise professional standards (39%) (PARN, 2011).

The stated benefits of professional accreditation in the documents produced by professional bodies reflect these two core purposes, but often extend significantly beyond them. While many of the stated benefits of accreditation are self-evident, Ingvarson et al (2006) noted that research on the effects of accreditation is rather scarce, probably because the issues involved in implementing valid research designs to test this question are complex.

3.3.2 Institutional perspective

Of course different stakeholder groups have somewhat different perceptions of the benefits of professional accreditation.

An analysis of professional accreditation of bachelor level nursing programs in the US (Freitas, 2007) identified the following benefits of accreditation for an academic institution:

- Recognition as a quality program
- Graduate access to higher levels of education

- Promotes quality education
- Quality job placement for graduates
- Stimulus for program change
- Leverage for negotiating program resources
- Ability to recruit quality faculty
- Leverage for negotiating faculty resources
- Opportunity to network with colleagues

Institutional administrators were asked to rate the value of these benefit factors. The most highly valued benefits were, in order:

1. affirmation and recognition of program quality
2. leverage for resources; and
3. graduate access to jobs, opportunities, and higher education.

Respondents were also asked to identify any other additional benefits of professional accreditation. The list of additional benefits was:

- Professional affiliation and access to their resources
- Ability to attract qualified students
- Coherence and congruity in the curriculum
- Brings faculty together; encourages teamwork
- Forces programs to collect and analyze outcome data systematically
- Achieving quality programming and meeting a national benchmark
- Students and graduates are eligible for federal assistance programs
- The negative of not being accredited is powerful
- Used as part of the university funding formula
- Recognition of quality inside and outside the profession (builds credibility in the university).

The most commonly cited and most highly valued benefits of professional accreditation from the perspective of the academic institution relate to the affirmation and recognition of program quality. This has been referred to as "external signalling of quality" (Beehler and Luethge, 2013). As Freeman and Evans (2016) note: "the more reputable the accreditation agency, the greater the attraction of the school or university to students, academics and other stakeholders and networks".

Lying behind this broad factor is a range of more specific perceived positive impacts on quality. For example, it has been reported that academic staff feel that accreditation processes stimulate critical examination of the curriculum, including the combination of subjects offered, the relevance of the learning content, the appropriateness of the student assessment activities, and how professional competencies are covered in the syllabus. (Hallam, 2013, Carrivick, 2011). Accreditation is seen as providing both a motivation and a rigorous process for internal evaluation and continuous improvement

(Greenlaw, 2008), including benchmarking against national or international standards (Teaching Australia, 2007).

The external scrutiny involved in the accreditation process can also provide an independent perspective to identify new areas for improvement, and the interaction with representatives from industry and other institutions can enhance the quality of the program by providing opportunities for collaboration and the sharing of good practice (Yuen, 2012). There is evidence that institutions value accreditation as it provides proof that the course is backed up by external validation (CILIP, 2012a) and that there is a productive relationship between the institution and the professional body (Hallam 2013).

A notable feature of the benefits identified by institutional staff in the study of accreditation of US nursing programs (Freitas, 2007) is the prominence of resource considerations alongside the more commonly cited benefits relating to quality and graduate outcomes. In particular, the institutional staff valued professional accreditation for its ability to attract qualified students (and hence funding) and to provide leverage for seeking resources within the academic institution.

A similar analysis of professional accreditation of engineering programs in the US (Yuen 2012) produced similar outcomes. The benefits of accreditation given the highest mean scores for perceived value by institutional administrators were:

1. Recognition/prestige as a quality program
2. Graduate eligibility for professional licensure
3. The ability to attract quality students.

Again, resource considerations, specifically the ability to attract students and the leverage provided for additional resources, were noted as significant benefits of accreditation from the perspective of those responsible for the academic programs.

> Accreditation represents quality, demonstrates accountability, impresses funding sources, and shows commitment, thereby providing leverage for accredited programs to obtain resources and recruit top faculty and students. The recognition that accompanies an accredited program puts the department in a more favourable position to request funds and additional resources from upper administration (Gourley et al., 2008, p. 146). Administrators are compelled to provide resources to sustain accreditation to satisfy federal funding requirements and maintain their status as a provider of quality education among their peers and prospective employers (Goda & Reynolds, 2010). Recognition among industry and professional groups (Genheimer and Shehab, 2009) can also provide institutions with another avenue to access additional, untapped resources. (Yuen, 2012, p28)

Freeman and Evans (2016) point out that the accreditation process itself can provide access to valuable non-financial resources such as templates, proven procedures and research about practices that do and do not work.

In relation to the value of accreditation in attracting students, there is considerable discussion in the literature about the marketing advantages of an accredited course. For example, Hallam (2013) notes that:

> It has been reported (Ostwald et al, 2008; Lester, 2009; Carrivick, 2011; CILIP, 2012a) that students actively seek to enrol in an accredited course, with international students particularly keen to ensure that the accredited program is recognised in their home country. Website analytics demonstrate the advantage of listing accredited courses on the association's website, as this is often the starting point for prospective students to research which courses might be available to them in their field of interest. The institutions benefit directly from the referrals they gain from the association's website once prospective students follow the weblinks to the universities' own course information.

Other sources have noted the benefits of accreditation in relation to the recruitment of academic staff as well as students (Greenlaw, 2008, Yuen, 2012). Miles et al. (2015, cited in Freeman and Evans, 2016) found that of the Deans surveyed in their study, 79% of those outside North America saw accreditation as "a requirement to be a credible business school for faculty recruitment."

While there is no clear evidence of the scale of these positive effects on student and staff recruitment, the pragmatic observation rings true: the risks and potential negative perceptions of not being accredited are powerful (Freitas, 2007).

3.3.3 Student and graduate perspective

The proponents of professional accreditation assert that it provides a wide range of benefits for students and graduates in two broad categories.

First it enhances the quality and professional relevance of courses:

- Students develop stronger awareness of the professional knowledge, skills and attributes that are required by practitioners in a given discipline and have a clearer understanding of the skill sets that they have when they graduate (Hallam, 2013)
- Programs regulated by professional bodies provide students with access to greater expertise and technical knowledge, and offer possibilities for innovative practice (Baldwin, Cave & Lodge, 2012, cited in Dill & Beerkens, 2012)
- Accreditation is somewhat of a forcing function for institutions to attend to student learning outcomes (Shupe, 2007).

Second, it enhances graduate employability and professional mobility:

- The stamp of approval from the professional body means that students are more aware of their future career paths. Reciprocal accreditation arrangements with international bodies also broaden their career opportunities (CILIP, 2012a).
- Employers tend to seek recruits who are members of a professional accounting body, preferably an Australian one and accountants seeking global employment can gain a further advantage from joining an international professional body or

an Australian professional body with brand value in the relevant international context (Freeman and Hancock, 2012)

- A program that is accredited can positively impact graduate success. Aside from defining benchmarks of quality and enforcing the teaching of necessary knowledge and skills, accreditation also improves graduate marketability and future employment opportunities through international agreements and the satisfaction of prerequisite criteria for licensure and higher education (Yuen, 2012)

One study of students' own views found that they believe that professional accreditation ensures that there is a high level of confidence in the academic content of the course and that it offers a sense of employability after graduation (Carrivick, 2011). The students in this study felt that the program's connections with the association increased their awareness of future employers and of employment opportunities in the sector.

3.3.4 Employer and professional association perspective

From an employer's perspective, accreditation most obviously provides an assurance that the graduates they may employ will have received a solid professional knowledge base through their studies (CILIP, 2012a).

Accreditation also offers the professional association and individual employers a set of processes through which they can have direct input to professional preparation courses. It is seen as an important mechanism for engaging members of the profession in decisions about the standards expected of those entering their profession, as well as standards expected of preparation courses.

The requirements for accreditation often mandate employer engagement with the academic institutions through requirements for internships, fieldwork or industry experience, and employer involvement with course reference committees.

It has also been suggested that dialogue between employers and academic institutions can help inform decisions about the appropriate number of student places to be provided, supporting university and workforce planning activities in the given industry sector (Hallam, 2013). This observation is arguably less relevant in the context of Australia's demand driven system.

At a very pragmatic level, professional associations hope that students graduating from an accredited course will want to become members of the professional body responsible for the accreditation and expect that direct links into the education institutions will provide the opportunity to grow the association's membership base through the access to students (Yuen, 2012).

3.4 THE DRAWBACKS AND COSTS OF ACCREDITATION

Offsetting the acknowledged benefits of accreditation are widespread concerns about its drawbacks and costs, especially for academic institutions and their staff. In the literature these concerns seem to fall broadly into two categories. The first relates to the

costs of accreditation, both direct and indirect. The second broad category of concern relates to the nature of the accreditation processes and their potential for adverse impacts, for example on academic autonomy and program quality and diversity.

3.4.1 Costs of accreditation

Compliance with accreditation standards demands time, resources, and commitment. The magnitude and diversity of these costs lead some observers to the conclusion that accreditation is "one of the most expensive and least value-added processes that universities are required to engage in" (Malandra, 2008, p. 61).

From an institutional perspective, the costs of professional accreditation include direct costs in the form of the fees charged by the accrediting agencies. They also include a wide range of indirect costs associated with the staff time that the processes require, and with the less quantifiable personal impacts on staff and students.

3.4.1.1 Direct costs

A range of studies demonstrates the enormous variation in the direct costs of accreditation for universities. In some professions in some countries there are no direct costs to institutions, with the funding for accreditation processes coming from registration fees and other sources. In other professions the direct costs to an institution for initial accreditation can run into the tens of thousands of dollars, and there may be annual fees as well as re-accreditation costs. It is common for the education institution applying for accreditation to be asked to pay for all the direct costs of a site visit, i.e. the travel and accommodation costs for the members of the review panel. In Australia these costs come on top of fees that may be charged by the regulators (TEQSA and AQSA) and most accrediting agencies for their course accreditation purposes.

Hallam (2013) cites examples of professional accreditation fees in Australia ranging from zero (CPA Australia & Institute of Chartered Accountants in Australia) to over $28,000 (Australian Dieticians Association). As detailed in a later chapter in this report actual fees charged in Australia can be much higher than this. A wide variety of fees for institutions undergoing accreditation is also evident in other countries. In a research study undertaken in the UK in 2011, 28 professional bodies in the UK were asked about their practices in charging for accreditation. It was found that 18 levied fees, with charges covering the direct costs of the processes. Five associations recovered partial costs and one respondent indicated that the association made a profit from accreditation. On average, the costs for academic institutions in the UK appeared to be lower than in Australia. Education providers in the UK were paying on average £300 - £500 to become accredited. (PARN, 2011)

The lower average costs in the UK may arise from differences in the health professions. The most detailed study of accreditation costs in Australia was undertaken in 2014 as part of the Independent Review of the National Registration and Accreditation Scheme for health professions by the Professional Standards Authority (PSA), working in collaboration with the Centre for Health Services Economics and Organisation (CHSEO) (Snowball, K, 2014). It found that as a proportion of total spending on professional

registration, the accreditation function in Australia is markedly more expensive than the quality assurance of higher education in the UK. It cost almost three times more per registrant when the full cost of accreditation is recognised. The cost difference in accreditation between Australia and the UK on a per registrant basis was valued at over $30 million. Cost was found to have an inverse relationship to scale – the large number of small accrediting bodies in the Australian health professions appeared to be contributing to the higher average cost of the function in this country[3]. In response, AHPRA published a paper on the costs of accreditation in NRAS to clarify issues with the PSA study and present a more accurate analysis of costs.

Much of this cost in Australia is borne by the universities. The Australian approach contrasts markedly with UK arrangements, where the quality assurance of higher education health profession courses is undertaken by the regulator and is funded from the registration fee like other regulatory functions. There is no direct charge to the institution whose course is being quality assured in the UK. There are of course indirect compliance costs for course providers in both approaches.

3.4.1.2 Indirect costs

Numerous studies and reports have highlighted concerns about the time and effort that professional course accreditation requires of academic and administrative staff in the education providers (For example Crouch & Schwartzmann, 2003; Yue, 2007; Tan, 2008, Greenlaw, 2008, Gray, Patil, and Codner, 2009, Partridge et al, 2011, Hallam, 2013). Studies of the costs and benefits of engineering accreditation and nursing accreditation in the US both found that the highest cost value identified from a range of factors was for administrative and faculty (academic staff) time (Yuen, 2012, Freitas, 2007).

For academic staff, in addition to the indirect costs of the time involved in compliance with accreditation requirements, there are opportunity costs associated with the other tasks that would otherwise have been undertaken:

[3] The Accreditation Councils' Forum has drawn our attention to the fact that this costing was flawed. This was acknowledged in the establishment of the current accreditation system review and has been the subject of much correspondence within the Scheme. As an example, for medicine, the 2014 Snowball report includes the cost of the Australian Medical Council's process for examining international medical practitioners who wish to practice in Australia (which is a $18-19 million dollar operation). While this is defined as an accreditation function under the National Law, it is not a cost of accrediting programs of study. In addition, the 2014 Snowball report incorrectly stated that the AMC accredits 24 programs (in fact it accredits 37 providers and 119 programs). In 2016, the accreditation councils, national boards and the Australian Health Practitioner Regulation Agency worked together to produce good reliable data on costs of accreditation. This has been provided to Professor Mike Woods, who is undertaking the independent review of accreditation systems. The members of the Health Professions Accreditation Councils Forum are not the sole contributors to this costings work and, as all contributors have yet to agree to the document being made public, it cannot be provided at this time.

> "[It] is an enormous drain and the previous time it took days and days to get through the whole process, when you are bogged down in that kind of administrivia it takes you away from teaching" (Partridge et al, 2011, p.84).
>
> Some contend that the extensive need for documentation is overly cumbersome and reduces the time and energy faculty have for more direct, value-added activities such as teaching preparation (Hoecht, 2006, cited in Yuen, 2012)

A number of researchers and commentators have also observed that the time pressures and anxiety involved in professional accreditation make it a stressful process for institutional staff (Gourley, 2008; van Kemenade and Hardjono, 2009, cited in Yuen, 2012; Partridge et al, 2011).

It has also been argued that poor processes can add to the issues of cost of professional accreditation. For example, Hallam (2013) reports that

> Anecdotal evidence in Library and Information Science accreditation, as in other disciplines, indicates that the situation may often be compounded by problems associated with a lack of transparency or a lack of consistency in terms of the forms to be completed and the precise documentation to be submitted (CILIP, 2012a).

Lack of consistency is perceived to arise when different members of review panels bring different interpretations of standards and guidelines (Ostwald et al, 2008). Poor outcomes may also arise if the accreditation process is too superficial or purely retrospective (Biggs, 2001, Hallam, 2013).

A related issue is the potential for duplication of time and effort arising from multiple quality assurance requirements for system regulators and overlapping professional accrediting bodies. Potential duplication with system regulators is discussed further in section 2.5 below. Overlap between accrediting bodies has become a more significant issue as courses have become more multi-disciplinary and as new, often international accreditation arrangements have come on the scene as providers seek global reach and competitive advantage for their courses in some fields.

While the time and effort involved is most commonly reported as a concern for staff of education providers, it should also be acknowledged that professional accreditation involves substantial workload for staff of the accrediting bodies. This issue has received little attention in the literature, but is evident for example in the total costs of accreditation in the health professions identified in the Independent Review of the National Registration and Accreditation Scheme for health professions (Snowball, 2014).

3.4.2 Impact of accreditation processes on autonomy and flexibility

A second major set of concerns among academic providers relates to the potential for professional accreditation processes to stifle innovation, constrain academic autonomy, and reduce course diversity, distinctiveness and flexibility.

Cox (2010) notes the challenges of delivering an academic program which is distinctive but at the same time aligned with accreditation requirements. Ostwald et al (2008) assert that accreditation can have an homogenising effect. Freeman and Evans (2016) note that "innovation can be stifled if leaders fear potential changes may place achievement of accreditation at risk."

The strongest critics have argued that accreditation seeks to achieve quality through conformance and shifts control over content and delivery methods away from academics to administrators and external evaluators who focus on consistency in student experiences and the achievement of standard outcomes (Tovar and Castro, 2007; Hoecht, 2006; van Kemenade and Hardjono, 2009; Fredericks Volkwein et al, 2007, cited in Yuen, 2012). There have even been questions raised about whether the traditional model of professional accreditation is sustainable in the increasingly complex and competitive higher education environment (Walker, 2008).

The need for accreditation to be flexible and adaptable - to keep pace with the dynamic nature of contemporary professions and developments in teaching and learning – has been recognised in recent years through a shift in focus away from inputs and resources to an emphasis on learning outcomes, i.e. the skills, knowledge and understanding that students should acquire (see section 2.7.2 below).

3.5 RELATIONSHIPS BETWEEN THE MAIN STAKEHOLDER GROUPS

3.5.1 Professional accreditation bodies and system quality assurance entities

Professional accreditation in Australia operates as one component of a broader set of evolving quality assurance processes and structures. There are at least six different components to the Australian higher education quality assurance framework:

1. Qualifications are defined and structured through the Australian Qualifications Framework
2. Institutions are established and operate in accordance with the Higher Education Support Act 2003 and associated guidelines if they are eligible for Commonwealth funding or HELP loans
3. Institutions are also subject to registration/re-registration by TEQSA roughly every seven years
4. Courses may be approved and reviewed internally by self-accrediting institutions, or externally by TEQSA for other providers
5. Information, on matters such as student experience and graduate outcomes, is provided to government for a range of purposes including publication
6. External monitoring is conducted by a range of organisations, especially by professional bodies for accreditation purposes.

To this list could be added the operations of ASQA in respect of higher education providers in the VET sector, including dual-sector universities.

Several commentators have noted critically the extensive range of these various elements of the quality assurance system, the degree of overlap between them, and the

potential for inconsistencies and conflicts (Massaro, 2003, Luff and McNicoll, 2004, O'Keefe and Henderson, 2012, Hallam, 2013). These concerns have also been expressed by major stakeholders (Universities Australia and Professions Australia, 2016) and have been acknowledged by the government and the regulatory agencies (TEQSA 2016a).

TEQSA has agreed that the following principles should guide its engagement with professional bodies:

- the development of a complementary approach to course accreditation processes and requirements
- the use of professional bodies as a source of expert advice
- the sharing of information with professional bodies to inform TEQSA's regulatory activity and to protect the interests of students and the higher education sector;
- encouraging alignment of professional outcomes with learning outcome requirements of the Australian Qualifications Framework (AQF); and
- fostering communication between TEQSA and professional bodies regarding each other's respective roles.

TEQSA has also established a number of specific MOUs with professional bodies to facilitate cooperation and minimise the compliance burden on providers (TEQSA 2016a).

3.5.2 Academic institutions and the professions

The perceived drawbacks and costs of accreditation from an institutional perspective, at least in the past, led one commentator to describe accreditation as "a kind of ritualized, adversarial game played out by academics against practitioners" (Walker, 2008, p.250). In Australia, a study by the Higher Education Council noted that, while universities had tended to regard professional accreditation as an intrusion on their autonomy, it was seen as critical for attracting overseas students and was being increasingly regarded as a valuable process (NBEET, 1996). Although this reference is now somewhat dated it was the most recent relevant Australian government study found.

There have certainly been points of tension between universities and professional accreditation agencies, and to some degree these are inevitable and inherent in the nature of the exercise. There have also been some reports of particular questions being raised by universities in relation to the potential for conflict of interest in two circumstances:

- where an individual employed by one university is a member of an accreditation review team for a competitor university
- where an accrediting body itself offers educational programs as pathways to professional recognition in potential competition with the academic institutions that it accredits (Freeman and Hancock, 2012).

While the relationships between universities and accrediting bodies have not been straightforward, in recent years there has been an evident trend toward the introduction of agreements, statements of principle, memoranda of understanding and new ways of setting standards which are designed to improve accreditation processes and strengthen relationships between educational providers and professional

accreditation agencies. This trend is exemplified in Australia at the peak level by the recent Joint Statement of Principles for Professional Accreditation by Universities Australia and Professions Australia.

3.6 DEVELOPMENTS IN PROFESSIONAL ACCREDITATION PRACTICE

Two notable areas of development in professional accreditation practice are apparent in the recent literature: the articulation of statements of principles of good practice, and a shift towards an outcomes focus and learning standards.

3.6.1 Principles of good practice

The interest in pursuing good practice in professional accreditation and improved relationships between the main stakeholder groups is evident in the development of statements of principles by accreditation agencies, in Australia and in comparable countries.

In the UK for example, research on the practices of professional accreditation bodies identified the need for fair, transparent and robust processes which meet the following criteria:

- The process must apply explicit and publicly accessible requirements and standards. These standards may be benchmarked with other international accreditation standards and/or developed in consultation with the practitioner community
- The process must be consistent, valid and fair. Accordingly the assessment and monitoring process should be consistent, with the same criteria applied to all candidates. The assessment methods should be appropriate to what is being assessed
- The process must avoid conflicts of interest and sources of obvious bias
- The process should have an appeals procedure that includes recourse to independent arbiters
- The process should have an accountable and transparent system of governance. (Lester, 2010)

In Canada, the overarching Association of Accrediting Agencies of Canada (AAAC) specifies a set of guidelines for good practice to be observed by its agencies. The guidelines were most recently revised in March 2015:

- An accreditation process incorporates the principles of quality assurance and continuous improvement, which is transparent, fair and objective, and respects confidentiality.
- The purpose of the accreditation process is to evaluate the quality of academic programs and to promote their continuing improvement.
- The accreditation agency is autonomous from the educational program under accreditation review.
- The accreditation agency has representatives, and/or appointees, from relevant stakeholders.

- The accreditation agency administers its affairs with prudent fiscal and human resources management to ensure the accreditation process is effectively and consistently conducted.
- The accreditation review is held on site at the site(s) of the educational program under review and includes input from relevant stakeholders.
- Qualified reviewers, as defined by the accrediting agency conduct the accreditation review.
- A mechanism for training reviewers is in place.
- Clear description of the accreditation process, including the goals and specific steps and actions to be taken by the parties to the process are in place.
- Time-defined accreditation status and requirements to maintain the status are available.
- Published recognition of accredited programs is in place.
- Accreditation standards that are grounded in principles of quality, equity, consistency and objectivity are in place.
- Standards must be published and should relate to the following:
    - Requirements of the educational institution;
    - Administrative structure of the educational program;
    - Goals and objectives of the educational program;
    - Expected outcomes of the educational program;
    - Requirements for financial, human, technical, learning and non-academic resources including the use of computer technology and social media;
    - Evaluation mechanisms of both students and programs.
- Appropriate procedure for the appeal of accreditation decisions is in place.
- A process for continuous improvement of the accreditation standards and process is in place. (AAAC, 2015)

In Australia, most professions have established a set of principles or guidelines for the conduct of accreditation. There has been an increasing level of coordination in this activity. Professions Australia, representing 29 professional associations, established a set of guidelines for good practice in professional accreditation in 2008 and collaborated with Universities Australia in the Joint Statement of Principles for Professional Accreditation in 2016. The Joint Statement articulated principles in three areas: professional accreditation standards, professional accreditation processes, and stakeholder engagement.

Similarly, the Health Professions Accreditation Councils' Forum (HPACF - a coalition of 11 accreditation councils of the regulated health professions), adapted some of the earlier guidelines of Professions Australia for use in the health professions and has recently adopted a new set of 'high level accreditation principles' in June 2016 (HPACF, 2016).

Individual professions have developed and updated their own guidelines and principles in these contexts and in collaboration with other professions, or are in the process of doing so. For example, in September this year the Australian Pharmacy Council (APC) advised its members that:

> While we believe that the pharmacy profession is best served by an independent accrediting body for pharmacists, we actively work with other professional bodies

and accreditation councils in initiatives to ensure we are both efficient and effective in what we do.

As an active member of the Health Professions Accreditation Councils' Forum, we were instrumental in leading the development of a High Level Accreditation Principles document which describes how each of us are working towards meeting the best accreditation outcomes for the public. This outlines clearly the APC approach to accreditation, including the use of outcomes-based standards and robust and transparent processes.

We have also worked closely with our colleagues in Medicine, Nursing and Chiropractic in the development of inter-professional accreditation standards for application across all the health professions. (APC, 2016)

In some professions the development of principles and guidelines for good practice in accreditation is also occurring at an international level. For example, in April 2015 the International Engineering Alliance and the European Network for Accreditation of Engineering Education released an exemplar of best practice in accreditation of engineering programs (ENAEE/IEA 2015).

3.6.2 Outcomes focus and learning standards

Early approaches to course accreditation were based on criteria relating to inputs and resources, e.g. curriculum content, limits to class sizes, student-staff ratios and availability of facilities such as adequately equipped classrooms and libraries. There is now a global trend away from this program administration or input-based model to an emphasis on learning outcomes, i.e. the knowledge, skills, dispositions and abilities that graduates should be able to demonstrate. This change has been described as "a paradigm shift from traditional ways to measure and express learning characterized as input approaches… to output focussed methodologies" (Tammaro, 2006, p.405). A key purpose of the emphasis on learning outcomes rather than teaching inputs is to allow for greater flexibility and innovation in program design and delivery.

The shift to a focus on learning outcomes is a feature of both professional accreditation and broader systemic quality assurance arrangements. In the UK for example, 'subject benchmark statements' have been developed for a very wide range of disciplines and professions to "set out expectations about standards of degrees in a range of subject areas. They describe what gives a discipline its coherence and identity, and define what can be expected of a graduate in terms of the abilities and skills needed to develop understanding or competence in the subject" (QAA, 2016a). Subject benchmarking provides the Quality Assurance Agency (QAA) with a reference point to evaluate academic standards in different institutions and the QAA works with professional accreditation bodies to manage subject benchmark statements in their professional disciplines (QAA 2016b)

In Australia at the system level TEQSA registers and evaluates the performance of higher education providers against the Higher Education Standards Framework. The Higher Education Standards Framework (Threshold Standards) 2015 was

developed by the Higher Education Standards Panel following an iterative consultation process during 2012-14 and came into effect from January 2017. TEQSA states that the standards require education providers to specify course learning outcomes and that TEQSA may have regard to:

- learning outcomes statements developed for the field of education or discipline by discipline communities or professional bodies; and
- the requirements for professional accreditation of the course of study and registration of graduates where applicable. (TEQSA 2016b)

Development of discipline-specific standards was supported through the Learning and Teaching Academic Standards (LTAS) project which sought to establish threshold learning outcomes for a wide range of discipline areas. Academic standards, i.e. "learning outcomes described in terms of discipline-specific knowledge, discipline-specific skills including generic skills as applied in the discipline and discipline-specific capabilities" were developed in Accounting, Agriculture, Architecture, Agriculture, Building & Construction, Creative & Performing Arts, Education, Engineering & ICT, Geography, Health, History, Law, Medicine, Science, Veterinary Science. (ALTC 2010) In the professional disciplines this work built on and has subsequently influenced the development of professional accreditation standards.

Statements of learning outcome standards are now common in professional accreditation requirements in Australia and internationally. For example, assurance of learning standards was reflected in international education standards for accounting that came into effect in July 2015 (Freeman and Evans, 2016). The first point in the UA/PA Joint Statement of Principles for Professional Accreditation is that "professional accreditation standards should focus on professional competencies and learning outcomes at graduation". More detailed discussion of the shift to outcomes based accreditation is provided in Chapter 7 of this report.

4 CLASSIFICATION OF ACCREDITATION TYPES

4.1 OVERVIEW

Professional accreditation is conducted by professional bodies and/or accreditation agencies on behalf of the professions. Its stated and principal aim is to maintain the standards of professional training with the ultimate goal of providing the community with confidence that professional practice meets competency standards, ethical standards and ensures public safety. A spreadsheet summarising the main bodies and their approaches to accreditation is at Appendix 1.

A variety of regulatory approaches underpins the practice of professional accreditation. Broadly, and for convenience and clarity, these can be classified under the following four headings. It must be emphasised, however, that the operations of these groups often overlap and it is not a precise taxonomy. Apart from the first group whose operations are, in some form, legislated or governed by regulations the majority are self-regulated and closely associated with or co-existent with professional bodies.

1. National and state or territory based registration that is legislated or regulated.
2. National and international 'chartered' or registered status controlled by professional bodies that assess and/or train graduates of accredited courses for membership and award of chartered or registered status.
3. Professional associations, membership of or accreditation by which, is generally promoted and accepted as being required for employment in the profession.
4. Professional associations that provide access to advice, support, advocacy and continuing professional education.

These four groups are described in the following sections.

4.2 NATIONAL AND STATE OR TERRITORY BASED REGISTRATION

4.2.1 National registration

Australian Health Practitioner Registration Agency

Fourteen health professions (increasing to 15 in 2017) are regulated under the National Registration and Accreditation Scheme (NRAS) which was established by the Council of Australian Governments in 2008 and is administered by the Australian Health Practitioner Regulatory Agency (AHPRA). Each Registration Board may establish a committee to undertake accreditation or may contract an accreditation agency to undertake accreditation of professional education programs. The accreditation committee or agency accredits a program of study and the Board approves the program of study for the purposes of registration of graduates. Some jurisdiction-based Registration Boards continue to operate but only in relation to local issues such as

complaints and disciplinary matters. To maintain registration, graduates of accredited programs must demonstrate participation in continuing professional development and coverage by professional indemnity insurance. The accreditation authorities as at 2016 are listed below.

- Aboriginal & Torres Strait Islander Health Practice Accreditation Committee (ATSIHPAC)
- Chinese Medicine Accreditation Committee (CMAC)
- Council of Chiropractic Education Australasia (CCEA)
- Australian Dental Council (ADC)
- Australian Medical Council (AMC)
- Medical Radiation Practice Accreditation Committee (MRPC)
- Australian Nursing and Midwifery Accreditation Council (ANMC)
- Occupational Therapy Council (Australia & New Zealand) Ltd. (OTCANZ)
- Optometry Council of Australian and New Zealand (OCANZ)
- Australian Osteopathic Accreditation Council (AOAC)
- Australian Pharmacy Council
- Australian Physiotherapy Council (APC)
- Australian and New Zealand Podiatry Accreditation Council (ANZPAC)
- Australian Psychology Accreditation Council (APAC)

Each of these Councils and Committees has developed its own criteria and processes for accreditation through a process of consultation involving all stakeholders. The Councils have formed a Forum for regular discussion of issues of mutual interest. A 'Quality Framework for the Accreditation Function' was adopted in 2012 and is reviewed every three years. The Forum has also adopted a common evaluation form to seek feedback from providers and reviewers on the accreditation process. Accreditation arrangements were reviewed by the National Boards for the first ten professions to be regulated under the NRAS in 2012. The next four professions to join the NRAS were only regulated from 2012 and have not yet reviewed their arrangements due to other reviews. A further review of accreditation arrangements has been deferred pending the outcomes of an independent review of accreditation systems within the NRAS. The Accreditation Systems Review is due to report in late 2017. Each six months the accreditation authorities report to the Boards on developments relevant to the eight domains of good practice in the Quality Framework which are:

1. Governance
2. Independence
3. Operational management
4. Accreditation standards
5. Processes for accreditation of programs and providers
6. Assessing authorities in other countries
7. Assessing overseas qualified practitioners

8. Stakeholder collaboration.

4.2.2 Australian Tax Practitioners Board (ATPB)

The ATPB maintains the register of tax agents, BAS agents and tax financial advisers. It is regulated by legislation. It does not accredit courses but accepts that courses registered by TEQSA or ASQA have "sufficient quality assurance safeguards in place" to ensure professional and educational standards and institutional sustainability.

4.2.3 State or territory based registration

Some professions continue to have jurisdiction-based registration although are in various stages of ensuring national consistency. Principal among these are:

- **Engineers Australia** has established the National Engineering Register as a means of presenting registered engineers and their services to the public and assuring them of professional standards. Queensland and Victoria are the only states that legislate for registration of engineers and both consider registration on the NER as a criterion for their registration.
- Practising architects must be registered by the Architect Registration Boards in each jurisdiction but all Boards use the common National Standard of Competency for Architects criteria and processes, and accreditation panels are drawn up from a standing panel list maintained by the **ANZ Architecture Program Accreditation Procedure** (ANZ APAP). The Australian Institute of Architects and the Architects Accreditation Council of Australia are co-owners of ANZ APAP.
- State and territory governments are responsible for teacher registration and initial teacher education program accreditation through their regulatory bodies. The **Australian Institute for Teaching and School Leadership (AITSL)** provides the *Australian Professional Standards for Teachers*, the national foundation for teacher registration and program accreditation in each jurisdiction. The implementation of the revised *Accreditation of Initial Teacher Education Programs - Standards and Procedures* from 2016 will be overseen by AITSL. Initial Teacher Education providers are also subject to the requirements of the A*ustralian Qualifications Framework,* the *Tertiary Education Quality and Standards Agency (TEQSA)* and *ESOS standards.* In addition initial teacher education providers may be subject to the regulatory requirements of the Australian Children's Education and Care Quality Authority (ACECQA), Careers Industry Council Australia (CICA), Australian Library and Information Association (ALIA), and others. For some programs there are also international requirements to be met.
- Law graduates must be admitted to practice by the **Legal Profession Admission Board (LPAB) in each jurisdiction**. The Law Admissions Consultative Council (LACC) and the Council of Australian Law Deans (CALD) have been working towards common standards for Australian law schools and common institutional and procedural mechanisms to allow the same assessment processes for each law school to result in accreditation as an appropriate provider of the academic requirements for admission in all jurisdictions.

- Veterinary science graduates are currently required to be registered by the **Veterinary Boards in each jurisdiction**. The Australian Veterinary Boards Council (AVBC) has established the Veterinary Schools Accreditation Advisory Committee to oversee a national approach and legislation is in process to allow national registration.

4.3 NATIONAL AND INTERNATIONAL 'CHARTERED' STATUS CONTROLLED BY PROFESSIONAL BODIES THAT ASSESS AND/OR TRAIN GRADUATES OF ACCREDITED COURSES FOR MEMBERSHIP AND AWARD OF CHARTERED OR REGISTERED STATUS.

Chartered status is usually achieved through graduation from an accredited program followed by specialised training and competency assessment by the professional body, as well as assessment of professional experience and performance. To maintain chartered, registered or accredited status some form of ongoing professional development is required.

- **The Dietitians Association of Australia (DAA)** has developed a credentialing system for awarding the title of 'Accredited Practising Dietitian' (APD) to Nutrition and Dietetics graduates of accredited programs. The title APD is protected by law and recognised by the Australian Government for the purposes of Medicare, Department of Veterans' Affairs and private health funds rebates.
- **Engineers Australia** maintains the National Engineering Register but also the award of Chartered status in Australia is carried out exclusively by Engineers Australia and reciprocal international agreements are in place. Chartered status is a 'Badge of Competency' awarded after assessment of both qualifications and professional practice. Engineers Australia provides professional development programs to assist with development of the necessary professional competencies. Engineers Australia awards chartered status as Chartered Professional Engineer, Chartered Engineering Technologist or Chartered Engineering Associate.
- **The Institution of Chemical Engineers** based in the UK awards Chartered Chemical Engineer status and accredits internationally programs in Chemical Engineering.
- **Chartered Accountants Australia & New Zealand (CAANZ)** accredits courses as satisfying the academic requirements for entry to the Chartered Accountants Program run by CAANZ. CPA Australia coordinates with CAANZ to accredit accounting programs in Australia.
- **The Chartered Institute of Management Accountants (CIMA)** merged with the American Institute of CPAs (CIMA Global) provides its own Professional Qualification Syllabus and Assessments for award of the title Chartered Global Management Accountant. The 2015 CIMA Advance Framework simplifies the accreditation process by streamlining exemptions given to students and graduates from higher education institutions in each country. Programs majoring in accounting or finance are pre-allocated into Advance Route 1, 2 or General depending on the "strength of the HEI and its program within the country". There

are 42 ‘exemptions’ in Australian universities and higher education providers listed on the database.

- **Institute of Public Accountants (IPA)** accredits courses to provide recognition of prior learning towards the IPA’s own Graduate Certificate and Masters programs which are necessary for full membership of the Institute.
- **Australian Human Resources Institute (AHRI)** accredits courses but also runs its own practising certification program at AQF level 8.
- **Australian Marketing Institute (AMI)** accredits courses and offers membership to graduates as well as Certified Practising Marketer status which is a recognition of both formal education and successful application of marketing knowledge and skills.
- **The Royal Institute of Chartered Surveyors (RICS)** offers a number of accreditations in specialist areas such as building surveying, dispute resolution, expert witness accreditation, mediation, and valuation. It does so by administering the Assessment of Professional Competence necessary for the award of Member of RICS or accredited surveyor in the above specialist fields.
- **Australian Institute of Occupational Hygienists** awards ‘certified practitioner’ status to graduates of accredited courses and those with satisfactory performance on an examination.
- **Australian Register of Counsellors and Psychotherapists (ARCAP)** is an independent, national Register of Counsellors and Psychotherapists established by the Psychotherapy and Counselling Federation of Australia and the Australian Counselling Association. All members of the register are professionally qualified in counselling or psychotherapy, meet ongoing professional development requirements and have clinical supervision of their professional practice to ensure quality and ethical compliance.
- **Australian College of Physical Scientists and Engineers in Medicine (ACPSEM)** accredits postgraduate university courses as well as clinical departments offering medical physics and radiopharmaceutical science. It accepts graduates of those courses into the College’s Training, Education and Assessment Program (TEAP).
- **Australian Institute of Building (AIB)** accredits building and construction degrees using competency standards that are aligned with the National Building Professionals Register and National Licensing of builders. Completion of an accredited course meets the academic requirements for membership of AIB.
- **Australian Institute of Mining and Metallurgy (AusIMM)** does not accredit courses but accredits individuals for ‘Chartered Professional’ status.
- **Financial Planning Association and its Education Council (FPA and FPEC)** accredits courses and maps against the requirements of Australian Securities and Investment Commission (ASIC). FPA also runs its own certification and continuing professional development programs.

4.4 PROFESSIONAL ASSOCIATIONS, MEMBERSHIP OF OR ACCREDITATION BY WHICH IS GENERALLY PROMOTED AND ACCEPTED AS BEING REQUIRED OR DESIRABLE FOR EMPLOYMENT IN THE PROFESSION.

Membership of these associations may be required for employment under certain industrial relations agreements or by convention, or by preference as an indicator of certain competency and ethical standards. Various categories span full membership, student membership or inactive membership. Membership usually carries expectations for continuing professional development as well as benefits such as access to special courses, conferences, newsletters, journals, discounts, advocacy, use of logos, assistance with job search, and inclusion on a membership register.

- **Australian College of Health Services Management** accredits courses and offers membership to graduates of those courses.
- **Australian Community Workers Association** accredits courses and offers membership to graduates of those courses and others who meet criteria**.**
- **Australian Computer Society (ACS)** accredits courses and accepts members.
- **Australian Institute of Medical Scientists (AIMS)** accredits courses and accepts members.
- **ANZ Arts Therapy Association** professional membership (called professional registration) is open to graduates of approved courses in Australia and internationally.
- **Australian Music Therapists Association** offers membership to graduates of accredited courses who are called Registered Music Therapists.
- **Environmental Health Australia** offers membership to graduates of a broad range of approved courses.
- **Speech Pathology Australia** accredits courses and offers membership to graduates of those courses.
- **Australian OHS Education Accreditation Board** accredits programs, graduates of which may seek membership of the Safety Institute of Australia.
- **The Nutrition Society of Australia** has established a voluntary register for graduates of programs accredited by the Dietitians' Association of Australia (DAA).
- **Diversional Therapy Association of Australia National Council** (DTAANC) accredits courses and offers full membership of the DTA to graduates of those courses.
- **Australian Institute of Landscape Architects** accredits courses and offers membership to graduates of those courses.
- **Planning Institute of Australia** accredits programs and offers use of the suffix MPIA to members who are graduates of accredited courses.
- **Australian Institute of Quantity Surveyors** accredits courses in Australia, Malaysia, NZ, South Africa, Singapore, Hong Kong, Canada and Sri Lanka and completion of an accredited course meets the academic requirements for membership of AIQS.

- **Australian Institute of Building Surveyors** accredits individuals for membership and as part of this considers their education history. AIBS does not accredit courses.
- **Australian Property Institute** accredits courses and offers membership to graduates of those courses.
- **Australian Institute of Project Management** conducts 'course endorsement' and assesses potential members on a number of academic and professional experience competencies.
- **Australian Library and Information Association** accredits courses and offers membership to professionals.
- **Records and Information Management Professionals Australia (RIMPA)** has a 'recognition program' for courses that align with the 'Statement of Knowledge for record keeping professionals'. It accepts members who have completed those courses.
- **Australian Institute of Physics** accredits courses and accepts members as well as student members.
- **Royal Australian Chemical institute** accredits courses and accepts members as well as student members.
- **Statistical Society of Australia** accredits courses and graduates of accredited courses have automatic admission as a 'graduate member'.
- **Australian Society for Microbiology** does not accredit courses but assesses qualifications of applicants for professional membership and fellowship.
- **Financial Services Institute of Australasia (FINSIA)** does not accredit but is affiliated with Macquarie University. It offers membership for financial services industry.
- **Association of Advanced Collegiate Schools of Business (AACSB International)** conducts accreditation of business schools globally and maintains a website with rankings on accredited business schools and job**s.**
- **European Quality Improvement System (EQUIS)** accredits institutions and courses globally.
- **Association of MBAs (AMBA**) is based in London and accredits business schools globally.
- **Australian Association of Social Work (AASW)** accredits courses and encourages membership by graduates.
- **National Accreditation Authority for Translators and Interpreters (NAATI)** assesses courses and graduates of approved courses are accredited by NAATI.
- **Public Relations Institute of Australia (PRIA)** accredits courses and accepts members.
- **Australian Traditional Medicine Society** offers membership to graduates of accredited courses.
- **Natural Herbalists Association of Australia** offers membership to graduates of accredited courses.

- **Australian Natural Therapists Association** offers membership to graduates of accredited courses.

4.5 PROFESSIONAL ASSOCIATIONS THAT PROVIDE ACCESS TO ADVICE, SUPPORT, ADVOCACY AND CONTINUING PROFESSIONAL EDUCATION.

These bodies provide a variety of member benefits as well as a professional peer group for the maintenance of education and professional standards. This is a sample of the most significant ones. Professional associations of this type are too numerous to list comprehensively.

- **Australian Mathematical Society** does not accredit courses.
- **Institute of Analytics Professionals of Australia (IAPA)** does not accredit courses but offers its own online courses and a 'featured partner' is Deakin University.
- **Australian Society of Archivists (ASA) a**ccepts members based on a 'Statement of Knowledge for record keeping professionals'.
- **Australian Society for Biochemistry and Molecular Biology** does not accredit courses.
- **Geological Society of Australia** does not accredit courses.
- **Australian institute of Geoscientists** does not accredit courses.
- **Environment Institute of A&NZ** does not accredit courses.
- **Australian Society of Horticultural Science** does not accredit courses.
- **Australian and New Zealand Industrial and Applied Mathematics** (ANZIAM) does not accredit courses.
- **Ecological Society of Australia** does not accredit courses.
- **Institute of Australian Geographers** does not accredit courses.
- **Institute of Actuaries of Australia** does not accredit courses.
- **Chartered Financial Analyst Institute (CFA)** is a global association of investment professionals which runs its own courses and examinations.

5 ACCREDITATION PRACTICE

5.1 OVERVIEW

In general professional accreditation is valued by all stakeholders. Most accreditors and education providers stress the value of accreditation as a stimulus to self and peer review, a benchmarking process and an opportunity for continuing quality assurance and improvement.

The majority of published accreditation documentation of mainstream professions follows a similar pattern, although details in the process vary and there is a significant range in the level of guidance given. All identify professional competencies or core bodies of knowledge against which graduates must be assessed. Most, but significantly not all, have evolved less prescriptive criteria for the means by which providers assist students to achieve learning outcomes. In disciplines where public safety is pre-eminent there tends to be more prescriptive treatment of fieldwork and placement experiences. For example, the Australian Nursing and Midwifery Accreditation Council, while supportive of the role of simulation in curricula, will not permit simulated learning to replace any of the minimum mandated 800 placement hours required by registered nursing students.

Input from education providers, however, indicates that in spite of a move by the professional bodies themselves in the direction of learning outcomes assessment, with less prescriptive emphasis on inputs, there is often a significant gap between published criteria and processes and the practices that some professional expert reviewers and assessors adhere to when accrediting a program. Examples are provided in Chapter 6.

Almost all require applicants for initial accreditation to submit a self-assessment against published criteria. The self-assessment is then evaluated before the provider is invited to proceed for full assessment. Accreditation is usually given for a maximum period (5-10 years) after which re-accreditation is required. If there are any reservations held by the accrediting body lesser periods of accreditation may be given with reporting requirements as part of conditional accreditation. A small number do not convert conditional or provisional accreditation to full accreditation until after the first student cohort graduates. This represents a significant risk to graduates and providers if subsequent full accreditation is withheld.

All accrediting agencies require some form of monitoring of the accredited program, usually in the form of annual reports, and all require notification of significant changes affecting the accredited program. There is an early trend towards elimination of a set period of accreditation in favour of accreditation that remains current subject to ongoing annual monitoring reports with full or partial reviews if warranted.

Only a few accrediting bodies attempt to maintain a prescriptive approach to the resourcing of the academic unit offering the program, for example, the academic staff,

infrastructure, practicum supervision. These bodies also tend to be more prescriptive about the nature and quantity of the student learning experience.

Review of the published documentation of accrediting bodies reveals that the most are aware of the regulatory environment for higher education, some in more detail than others, and a similar statement can be made for awareness of the higher education context and processes of academic governance and internal quality assurance. Once again, however, providers report that visiting accreditation teams sometimes seem to be unaware of the Higher Education Standards Framework, the TEQSA process or indeed the internal accreditation mechanisms of the providers.

The paperwork involved in initial accreditation applications and in regular reporting is significant, and for an academic unit offering a wide range of, for example health professions programs, could be quite onerous in the aggregate. Most providers make some comments in this regard. Work has been done on harmonising health professions accreditation[4] and is ongoing for those professions regulated within the National Registration and Accreditation Scheme, but it is likely to be a lengthy and complex process.

The few professions that retain state and territory based accreditation and/or registration (Law, Initial Teacher Education, Architecture, and Veterinary Science) have recently developed or are working towards common national standards and processes. Although these efforts are being undertaken voluntarily and with goodwill they are nevertheless slow to progress because of the substantial histories in each jurisdiction and the inherently conservative or politically sensitive nature of some professions.

Various groups of professional and accrediting agencies have begun to work on common standards for criteria and processes for professional accreditation. These have been published as guidelines or principles and work is ongoing to refine them and develop guidelines for their implementation. Three principal ones – the UA/PA Joint Statement, the Health Professions Accreditation Councils' Forum's High Level Accreditation Principles, and the Accreditation of Initial Teacher Education (ITE) Programs in Australia - Standards and Procedures, have been used as the basis of analysis of accreditation in this report and are summarised in sections 5.2, 5.3 and 5.4 below.

[4] O'Keefe, M., Henderson, A., Jolly, B., McAllister, L., Remedios, L. and Chick, R. Harmonising Higher Education and Professional Quality Assurance Processes for the Assessment of Learning Outcomes in Health. Office for Learning & Teaching, 2014. http://www.olt.gov.au/project-harmonising-higher-education-and-professional-quality-assurance-processes-assessment-learnin

5.2 UNIVERSITIES AUSTRALIA AND PROFESSIONS AUSTRALIA 'JOINT STATEMENT OF PRINCIPLES FOR PROFESSIONAL ACCREDITATION'[5]

Universities Australia and Professions Australia released the Joint Statement of Principles for Professional Accreditation on 9 March 2016. It has broad support and is an ongoing project.

This Statement is designed to:

- provide jointly agreed principles for the professional accreditation of Australian university courses that prepare students for entry into the relevant level of professional practice in a specific professional discipline;
- encourage national consistency of the professional accreditation standards and processes at the discipline level, including between states/territories and professional accreditation panels, and consistency at the level of principle in a discipline's requirements;
- be widely applicable and inclusive to reflect the diversity in the educational design, delivery, quality processes and institutional structures that exist within the higher education sector and to reflect the different context and quality processes of the professional associations and professional accreditation bodies;
- ensure that professional accreditation processes operate in a transparent, accountable, efficient, effective and fair way.

The key principles in the statement relate to professional accreditation standards, processes and stakeholder engagement:

Professional accreditation standards should

- focus on professional competencies and learning outcomes at graduation;
- develop criteria for professional accreditation that meet relevant Australian and international benchmarks and are demonstrably based on available research and evidence;
- take due and realistic account of the wider higher education environment, including the demands made by other external agencies on universities, limitations in available resourcing and diverse institutional circumstances;
- be cognisant of and distinguish between the respective requirements of the TEQSA – responsible for monitoring adherence to the Higher Education Standards Framework – and professional accreditation bodies – responsible for professional accreditation – and should not lead to duplication of effort or process;

[5] Universities Australia and Professions Australia Joint Statement of Principles for Professional Accreditation. 9 March 2016. https://www.universitiesaustralia.edu.au/uni-participation-quality/Quality/Principles-for-Professional-Accreditation#.V60iSI4te5o

- engage stakeholders, including universities, in the development and review of professional accreditation standards and relevant guidelines and processes;
- be published, together with the accreditation processes to be used by the professional accreditation body; and
- be reviewed regularly.

Professional accreditation processes should

- recognise that universities are academically self-accrediting and have wider roles in learning and teaching, scholarship, research and community engagement;
- consider resources, processes, policies and practices where appropriate;
- base the evaluation of university courses on the published professional accreditation standards;
- be transparent, consistent and predictable to stakeholders, including universities and students;
- be informed by an understanding of the distinct and complementary roles of professional accreditation bodies and universities which have responsibility for academic accreditation;
- clearly define scope and activities of accreditation panels;
- implement procedures for identifying, recording and managing perceived or actual conflicts of interest in the professional accreditation process, including those pertaining to the membership of accreditation panels;
- have effective complaints and appeals processes relating to the accreditation process and decisions by professional accreditation bodies; and
- minimise the cost of professional accreditation on universities, for example by being prepared to share and accept information from complementary accreditation processes.

Stakeholder engagement is enabled by professional accreditation through

- engaging stakeholders, including students, governments, education providers, industry, the profession and consumers/community in the work of the professional accreditation body beyond the direct development of professional accreditation standards;
- working towards such approaches for disciplines that do not have consistent national professional accreditation processes;
- working towards the development of a complementary approach to course accreditation between universities and professional accreditation bodies; and
- working to resolve overlaps between different accrediting bodies in the same field.

We have used the principles in the Joint Statement relating to professional accreditation standards and processes as the basis for an analysis of the criteria and processes used by major accreditation authorities, presented in Appendix 2. The analysis presented in

Appendix 2 relies totally on published information on the accrediting agencies' websites. In some cases this is voluminous and located in several places.

The following list of principles from the Joint Statement provides a key to the headings in the table in Appendix 2. A tick is placed in the table to indicate that mention of the relevant criterion in some form is published. Where cells in the matrix are blank this signifies that mention of the criterion was not found in published information. This should only be taken as a general indication since it is possible that the criterion is adhered to but simply not mentioned or not found in the documents we perused. Nevertheless, it is an indication that it was not 'top of mind' when the documentation was prepared. It should also be noted that some documents preceded the formation of the new regulatory landscape as represented by TEQSA and the Higher Education Standards Framework and many documents are undergoing review and might not yet reflect those developments. The UA/PA Joint Taskforce is currently working on implementation aspects of the Statement of Principles and expects to have draft guidelines for consideration towards the end of 2016, or early 2017.

UA/PA guiding principles for accreditation standards

Principles	**Key to table in Appendix 2**
Learning outcomes focus	Outcomes & flexibility
Meet Australian and international benchmarks	Benchmarks
Take due and realistic account of HE context	H.E. Context
Avoid duplication of effort with TEQSA	TEQSA aware
Engage stakeholders in development and review	Consult stakeholders
Published with processes	Publish
Reviewed regularly	Review

UA/PA guiding principles for accreditation processes

Processes	Key to table in Appendix 2
Recognise self accrediting status and wider role of universities	Roles of HEP
Consider resources, processes, policies and practices where appropriate	Infrastructure
Base evaluation on published professional standards	Criterion referenced
Transparent, consistent, predictable	Transparency
Understand complementary roles of professional and academic accreditation	Complementary to academic accreditation
Define scope and activities of panels	Panel scope & training
Management of conflict of interest	COI
Effective complaints and appeals processes	Appeals
Minimise cost by being prepared to share and accept information	Share info

The analysis in Appendix 2 indicates that almost all agencies are in compliance with the general principles for good practice, at least as far as their published material reveals. The area of most apparent deficiency relates to the definition of panel scope and training of panel members. This is consistent with views expressed by both providers and accreditors that review panel members sometimes exceed or deviate from the scope of the published standards for review. This observation is considered in more detail later in this report.

Professions Australia convened a Forum to provide information for this project and members emphasised that most of them have a considerable history of accreditation, in some form, extending back for many years. Newer professions, for example in the information technology areas have a shorter but still considerable history. Some agencies collaborate to accredit programs e.g. CPA and CAANZ jointly accredit accounting programs, and ACS and Engineers Australia jointly accredit software engineering programs.

Many agencies accredit providers other than universities. Some are private higher education providers but others are not for profit bodies engaged in specialty training. For example state health departments that provide medical intern training have to be accredited to do so. Specialty medical colleges are also accredited by the Australian

Medical Council to provide specialist training programs. If providers of specialist training wish to be recognized as higher education providers and provide degree programs in their own right (as is the case with the Institute of Psychiatry in NSW which is part of the Health Education Training Institute) they must also be registered by TEQSA as a higher education provider. The Australian Medical Council and TEQSA collaborate in such cases.

5.3 HEALTH PROFESSIONS ACCREDITATION COUNCILS' FORUM 'HIGH LEVEL ACCREDITATION PRINCIPLES'[6]

The accrediting bodies for the 14 professions regulated under AHPRA operate within the National Law and the Quality Framework for Accreditation, a common set of good practice guidelines, quality frameworks and reporting requirements. Their accrediting status is reviewed every 5 years. The focus of the National Law is on the protection of the public and all entities operating under the National Registration and Accreditation Scheme must have regard to the Scheme's objectives:

(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;
(b) to facilitate workforce 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;
(c) to facilitate the provision of high quality education and training of health practitioners;
(d) to facilitate the rigorous and responsive assessment of overseas-trained health practitioners;
(e) to facilitate access to services provided by health practitioners in accordance with the public interest;
(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.

Under the National Law accreditation bodies develop standards which are ultimately approved by national registration boards. A set of procedures for developing standards has been defined and Health Ministers have the power to issue a direction to a board about proposed standards if, in their opinion, the proposed standard will have a negative impact on the recruitment or supply of health practitioners and if they have first given consideration to the potential impact of the Council's direction on the quality and safety of health care.

The concept of independent accreditation functions is critical to the model of accreditation in the National Scheme and evolved as the Scheme developed. The Inter

[6] Health Professions Accreditation Councils' Forum. High Level Accreditation Principles. (June 2016) http://www.healthprofessionscouncils.org.au/files/2cadbe6ec554a48836e6d0d60e54834d33349d6f_original.pdf

Governmental Agreement that underpinned the development of the Scheme explains the concept of independent accreditation as: "Governance arrangements that provide for community input and promote input from education providers and the professions but provide independence in decision-making".

This independence is balanced with oversight and review of the operations of the accreditation authorities. The accreditation councils for the professions that joined the Scheme in 2010 were all reviewed in 2012-13, to determine if they should continue to be assigned the accreditation role for the profession. This entailed a substantial self-study report against the domains of the Quality Framework for Accreditation, and an invitation to stakeholders, including health departments and education providers, to make submission as part of the review of the individual councils. Following this exercise, all the accreditation authorities operating in the Scheme have been subject to six monthly reporting against defined domains. In addition, there are guidelines concerning the development and review of accreditation standards by the accreditation authorities, which include a requirement for international benchmarking, wide ranging stakeholder consultation, and liaison with the Office of Best Practice Regulation on whether proposed changes to standards require a Regulatory Impact Statement. The Forum regards these measures, together with the regular reporting to national boards on accreditation decisions, provide a strong framework for oversight of the work of the accreditation authorities, while allowing for accreditation decisions independent of undue influence.

Forum members share good practice in a number of ways including: the Forum's developing Innovations and Good Practice Database[7]; the Forum's Accreditation Managers subcommittee, which draws together accreditation staff from across the professions to share good practice and common accreditation challenges; and Forum workshops. Forum members also share their practices through presentations at national and international conferences such as the Ottawa Conference on Assessment/Australian and New Zealand Health Professions Education Conference, Perth February 2016, the International Association of Medical Regulatory Authorities Conference, Melbourne September 2016.

The Health Professions Accreditation Councils' Forum has developed a common structured feedback form for providers and assessors that will be used by all the AHPRA accreditation agencies after each accreditation visit.

The Forum has also developed and agreed to a common set of high level accreditation principles. Apart from aspects that are specific to the function of the legislation and the National Registration and Accreditation Scheme, these principles are basically congruent with those produced by Universities Australia and Professions Australia to which members of the Forum were contributors.

[7] http://www.healthprofessionscouncils.org.au/innovation

High level accreditation principles

1. We base our work and processes on the objectives of the National Registration and Accreditation Scheme (NRAS).
2. Our work is to protect the public by ensuring high quality education and training.
3. We work collaboratively with all bodies within the NRAS.
4. We will use a "right-touch" approach to accreditation.
5. We will benchmark our standards and accreditation processes to international standards.
6. We use our close connections with our professions to achieve objectives of the National Law.
7. We will develop accreditation standards that give priority to outcomes and results, and encourage improvement and innovation in education programs.
8. Where possible, we will build common approaches to accreditation standards and processes, while maintaining our own profession-specific requirements.
9. We collaborate and learn from other accreditation bodies.
10. We consult our education providers on accreditation processes and procedures.
11. We will maximise service and effectiveness through efficient and cost-effective accreditation processes.
12. We will ensure members of accreditation committees and staff have expertise and experience to deliver accreditation functions.

It is worthy of note that only a quarter of recognised health professions in Australia are regulated through NRAS. The remainder of Australian health practitioners operate outside of a formalised framework, with public protection offered only through a mix of practitioner voluntary membership of a self-regulating professional association, employer workplace arrangements and individual state legislation.

The National Alliance of Self Regulating Health Professions (NASRHP)[8], operating under the auspice of the Allied Health Professions Australia (AHPA) is composed of nine allied health professions which are not described under the NRAS and is representative of the broader collective of self-regulating health professions in Australia.

5.4 ACCREDITATION OF INITIAL TEACHER EDUCATION PROGRAMS IN AUSTRALIA: STANDARDS AND PROCEDURES.

State and territory teacher regulatory authorities are responsible for the accreditation and registration of school and early childhood teachers. Full details of the accreditation process and its implementation are provided on the AITSL website[9]. Unlike most other

[8] www.ahpa.com.au/.../AlliedHealthRepresentationonOrganisations.aspx

[9] http://www.aitsl.edu.au/initial-teacher-education/ite-reform/accreditation/implementation-2016

professions the teaching profession does not control these processes and generally plays an indirect role through representation on registration and provider boards and committees. The Australasian Teacher Regulatory Authorities (ATRA) provides a forum for collaboration and cooperation across the jurisdictions.

There has been a strong shift towards nationally consistent standards and processes for program accreditation and teacher registration in Australia following the 2011 Ministerial Council for Education, Early Childhood and Youth Affairs (now known as COAG Education Council) endorsement of a national approach to the accreditation of initial teacher education programs facilitated by AITSL. AITSL, established in 2010, operates under its own constitution under direction of the Commonwealth Minister responsible for Education. Priorities set by Education Council include guiding national reform including in the areas of teacher registration and accreditation of initial teacher education. The *Australian Professional Standards for Teachers,* developed by AITSL in collaboration with stakeholders, provides the national foundation for teacher registration and initial teacher education program accreditation in each jurisdiction with some local variations.

5.4.1 Background to the revised national approach to accreditation of initial teacher education programs

The Teacher Education Ministerial Advisory Group (TEMAG) was appointed by the Australian Government Minister for Education and Training in 2014 in response to concerns that initial teacher education programs were not adequately preparing new teachers with the practical skills needed for the classroom. Amongst other things it addressed concerns that program accreditation across Australia is inconsistent, leading to varying levels of teacher preparation upon graduation.

TEMAG concluded that the accreditation process clearly needs significant strengthening to achieve the rigour needed. The reported stakeholder concerns included the low rigour of the process for example:

- the limited evidence required to demonstrate the quality of programs and graduates
- the limited ongoing monitoring of programs
- providers' delivery practices and outcomes are not examined
- the procedure allows all programs to eventually achieve accreditation.[10]

TEMAG noted these concerns echoed the Productivity Commission's finding that "the requirements for evidence are too vague for accreditation panels to be able to objectively and consistently assess whether programs are producing high quality graduates".[11] TEMAG noted an international trend towards increasingly rigorous program accreditation requiring provision of research, evidence of program impact and

[10] Australian College of Educators submission
[11] Productivity Commission (2012), p.14

continuous improvement, to provide quality assurance. The TEMAG report [12] provided a number of recommendations to strengthen the national approach to the accreditation of initial teacher education programs.

5.4.2 National Program Standards and Procedures 2015

In response to the findings and recommendations of TEMAG, AITSL led the development of the revised *Accreditation of Initial Teacher Education Programs in Australia-Standards and Procedures*[13] to be implemented from 2016. The *Standards and Procedures* are designed to ensure that all graduates of initial teacher education programs meet the *Australian Professional Standards for Teachers* at the Graduate career stage on completion of their higher education qualification. The implementation is in its early stages and it is noted by some providers that the regulatory authorities take an increasingly collaborative and generally collegial approach working with providers and the teaching profession to develop and implement initial teacher education program requirements. Work is ongoing to address many of the problems providers are encountering. While valuing the objective of national regulation some providers nevertheless reported frustration with their experiences to date. The sources of this frustration are described under Section 5.4.3.

The approach to accrediting initial teacher education programs is based on an assessment of graduates' impact requiring evidence of pre-service teacher performance during the program; and evidence of the achievement of a program's graduates following completion, including their impact on student learning in schools. The jurisdictional teacher regulatory authorities lead and implement the *Standards and Procedures* in collaboration with AITSL which will periodically evaluate the accreditation decision-making process and initiate and lead activity to support nationally consistent assessment of evidence.

Providers report annually to the jurisdiction authority on data demonstrating impact, changes to the program, nationally required data and additional data required by the Authority.

In its simplest form, the key stages in the accreditation process are:

- Institution submits an application for program accreditation.
- Panel assesses program application and prepares draft accreditation report.
- Institution reviews the draft and provides a response.
- Panel completes the report taking into account the institution's response.
- Jurisdiction authority considers the report and advises AITSL of its decision.

[12]Teacher Education Ministerial Advisory Group, 2014, 'Action Now: Classroom Ready Teachers' http://www.students rst.gov.au/teacher-education-ministerial-advisory-group

[13] Accreditation of initial teacher education programs in Australia-Standards and Procedures. AITSL December 2015. http://www.aitsl.edu.au/docs/default-source/initial-teacher-education-resources/accreditation-of-ite-programs-in-australia.pdf

- AITSL publishes decision and accreditation status of the program.

The Program Standards are underpinned by a set of eight *Principles for National Accreditation:*

1. **Impact** – the accreditation process relies on evidence about the program's impact. Evidence of impact is drawn from both pre-service teacher performance and graduate outcomes.

2. **Evidence-based** – evidence must underpin all elements of initial teacher education, from the design and delivery of programs to the teaching practices taught within programs. Evidence is the basis on which panels make accreditation recommendations.

3. **Rigour** – a relentless focus on rigour across all elements of the accreditation process is vital in assuring robust and nationally consistent decisions, as well as the quality of programs and their graduates.

4. **Continuous improvement** – accreditation contributes to the improvement of the quality of initial teacher education and consequently of teaching and learning in Australia. The ongoing cycle of review and re-accreditation will provide assurance of graduate teacher quality and building public confidence in the profession.

5. **Flexibility, diversity and innovation** – accreditation encourages the capacity of providers to be innovative in the delivery of programs to meet the diverse needs of students and the profession, as long as the program can demonstrate a positive impact.

6. **Partnerships** – national accreditation is built around partnerships involving shared responsibilities and obligations among initial teacher education providers, education settings, teachers, employers, and Authorities and a shared commitment to improve initial teacher education and work in partnership to positively affect student learning and graduate outcomes.

7. **Transparency** – the accreditation process requires transparency across all elements of initial teacher education, from entrant selection to program outcomes. This results in publicly available data that is valid and comparable, as well as clarity for pre-service teachers about what to expect from initial teacher education and, in turn, what is expected of them throughout their course.

8. **Research** – accreditation generates and relies upon a strong research base that informs program design and delivery, and informs the continual improvement of teacher education programs by providers.

The accreditation process is in two stages. In Stage 1 (not to exceed five years) applications for new programs are expected to provide evidence against the *National Program Standards,* and a map of where in the program the *Graduate Teacher Standards* are taught, practised and assessed. In addition, they are required to present a plan for demonstrating impact describing both the pre-service and graduate outcomes measures to be collected and used as evidence to support an application for Stage 2. Once the program is established subsequent applications will use a risk-based approach.

The *National Program Standards* apply to both accreditation stage one and stage two. The examples in the list that follows highlight the responses to the major issues concerning initial teacher education programs raised by TEMAG and its recommendations.

> **Standard 1: Program outcomes** include providers identifying how their pre-service teachers demonstrate a positive impact on student learning.
>
> **Standard 2: Program development, design and delivery** include a requirement for evidence-based understandings of how the program will ensure teachers will have a positive impact on student learning.
>
> **Standard 3: Program entry** includes the requirement that entrants to initial teacher education have reached levels of personal literacy and numeracy broadly equivalent to the top 30% of the population.
>
> **Standard 4: Program structure and content** includes mandatory content requirements for primary programs (English/literacy, Mathematics/numeracy, and Science for all students) and discipline-specific curriculum and pedagogical studies for secondary programs.
>
> **Standard 5: Professional experience** includes a requirement that providers establish formal partnerships with schools/sites/systems, and specify thresholds for the amount of time to be spent in school settings.
>
> **Standard 6: Program evaluation, reporting and improvement** includes a requirement that providers develop and then implement a plan for demonstrating program outcomes in relation to pre-service teacher performance and graduate outcomes, including program impact.

This strengthened approach aims to ensure all initial teacher education programs are of a consistently high standard with a demonstrable impact on graduates and in turn on the students they teach. All initial teacher education programs will be required to plan for, collect and demonstrate evidence about the impact that their programs are having. This information will form the basis of the accreditation process, with accreditation panels making consistent judgments about programs.

5.4.3 Response of initial teacher education providers

As part of this mapping exercise we have analysed responses from initial teacher education faculties and schools included in the university responses to the survey as well as interviews with selected stakeholders, notably a teleconference with a group of Deans who provided information on behalf of the Australian Council of Deans of Education. AITSL was provided with a copy of this section of the report and invited to provide corrections to factual errors or suggested actions.

The scope of this project was to describe an overview of accreditation in all professions and its impact on providers. The project is not an evidence-based evaluation of accreditation effectiveness. Hence responses to our calls for input on impact have been reported as provided. We have reported the responses relating to initial teacher education separately in this section of the report as they relate to the unique circumstances surrounding the regulation and accreditation of initial teacher education

programs. Responses in relation to other professions have a great deal more in common with each other in both processes and impacts and are analysed together in Chapter 6.

Challenges

Providers report that the current environment of regulation of initial teacher education poses difficulties for initial teacher education program design. The view was expressed that the regulatory requirements appear, to a considerable extent, to have been set without sufficient regard for each other. Meeting all requirements, including in some cases international ones (which are necessary for the viability of international student markets), involves significant time and resources in negotiation. With respect to initial teacher education additional accreditation requirements continue to be mandated by some states despite the existence of an agreed national approach.

Providers described the complexity in the following terms:

> Providers must engage in:
>
> - Significant attention to identifying and managing areas of conflict directly with authorities (e.g. For initial teacher education: between ACECQA and State Agency for Early Childhood programs; between AITSL's Australian Professional Standards for Teachers and the AQF's Level 9 specifications for Masters programs).
> - Significant negotiation to ensure avoidance of the need for different compilations, formats, and multiple sets of complete documentation to meet various submission requirements, especially where providers operate over several jurisdictions.
> - Attention to additional requirements beyond a common core to respond to different State Government report cycles.
> - Management of conflicting evaluation requirements from up to 8 different panels (local, state and national) for the same program.
> - Complex negotiation with multiple industry stakeholders to communicate program requirements.

The heavy regulatory environment has been costly, requiring extra expert staffing for course development and management of accreditation processes, outlay of lodgement fees for the different accreditation authorities, hard copy printing rules where required by local authorities and the intangible costs of marketing uncertainty as courses flow through the accreditation steps. The costs continue beyond the accreditation stage as there are requirements from each regulatory body for detailed annual monitoring. For example, postgraduate accreditation bodies require ongoing professional accreditation at a cost (e.g. CICA for the Master of Education (School Guidance and Counselling / Career Development) and ALIA for the Master of Education (Teacher-Librarianship).

One university reports that the cost of accrediting Education courses can reach $100k in those years that the major courses e.g. MTeach or BEd. (Primary) are accredited. They also report that the faculty's contribution to accreditation panels for other universities' courses can reach $20k per annum.

Major challenges generated by the revised Standards and Procedures that were identified by providers centre on the requirement for evidence of pre-service teacher performance during the program; and evidence of the achievement of a program's graduates following completion, including their impact on student learning in schools. AITSL anticipated the concerns:

> It is acknowledged there are measurement challenges in assessing teachers' impact on student learning, but it is expected that improved mechanisms will develop over time, given the importance of measuring this impact[14].

Despite work done by AITSL in late 2015 to clarify the demonstration of impact[15] providers continue to have reservations about their capacity to meet the requirement to track, monitor and evaluate graduate performance. The following quotes from providers demonstrate the current tensions being experienced:

> "...a course cannot be fully accredited until evidence is provided that graduates two years after graduation have improved student learning outcomes. Despite requests from universities to the AITSL about how this requirement can be met, the AITSL has not been able to explain a process by which this could be done. Instead, Universities are required to explain to AITSL how they will comply."
>
> "In recent years there have been
>
> - Multiple and immediate requirements for change imposed by professional bodies and states, out of step with the university's normal review and re-registration processes, resulting in numerous changes to courses within a short timeframe.
> - The university has indicated that it will achieve a certain and specific requirement and then others are placed upon it at short notice with unrealistic timelines.
> - It is an ongoing, disruptive process with no understanding or appreciation of the workload for universities or the timelines that must be adhered to."

There are also concerns about the requirement to find placements for pre-service teachers, which had been a challenge for some time prior to the new standards regime. Regional universities point to particular issues for graduate entry students where placements are needed for a total of 60 days in metropolitan areas (40%) as well as regional areas. This requires University Liaison Officers and Academic Coordinators in sufficient numbers to provide a geographically convenient communication nexus between providers and the schools. The situation may be further exacerbated with the

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[14] Accreditation of initial teacher education programs in Australia-Standards and Procedures. AITSL December 2015. http://www.aitsl.edu.au/docs/default-source/initial-teacher-education-resources/accreditation-of-ite-programs-in-australia.pdf (p.9)

[15] http://www.aitsl.edu.au/docs/default-source/initial-teacher-education-resources/evidence-of-impact---summary-of-submissions.pdf?sfvrsn=2

National Program Standards requiring formal partnerships between the universities and individual schools.

Online provision of initial teacher education was a particular concern for some stakeholders. There was general agreement that online delivery can provide accessibility for some students. However, concerns were raised that the accreditation requirements are not strong enough to ensure external students are properly supported throughout their program. One provider suggested that: "professional accrediting bodies are still operating with a cultural construct of on-campus, face-to-face delivery of lectures, tutorials and workshops to students who live within a close proximity to the campus." Related to this was the concern that teacher education students have insufficient opportunities to gain experience in international contexts because accreditation requirements severely restrict the types of placements that are acceptable.

Providers saw some advantages emerging from the Standards and Procedures around the improved standing of initial teacher education within their institutions. This includes the likelihood of increased credibility for initial teacher education programs from state and national benchmarking, moderation and compliance with reporting frameworks. The procedures also have the effect of engaging senior executive leaders within the university sector to influence change and innovation.

While the scope of this project did not enable independent validation of specific submissions and comments they are, nonetheless, illustrative of the general tenor of feedback provided. Providers' concerns relating to the burden and insecurity surrounding the current arrangements are sufficiently widespread to be taken seriously. It seems clear from discussions with providers (whose individual circumstances vary markedly in many respects) that some view the situation as concerning and costly, and some as critical. While advantages of the strengthened model for accreditation are acknowledged nobody views the current situation as ideal. The view expressed by the representatives of the Australian Council of Deans of Education indicates that most would appreciate intervention of some type to provide additional clarity and support for the new national arrangements.

Impact on innovation

Initial teacher education providers have mixed views concerning the potential impact of the revised *Standards and Procedures* on innovation in course design and delivery. Some see the trend in initial teacher education towards more mandatory content in programs leaving little scope for innovation in course structure and limiting flexibility to adapt to changing contexts. As is the case for primary and secondary schools, the prescribed areas of the Australian Curriculum reduce opportunities to depart from traditional approaches, as one provider observed:

> "Because the prescribed curriculum takes up all the contact hours we have, our capacity to be responsive to local contexts becomes very limited, and we are unable to be adaptive to changing circumstances."

On the other hand, another provider pointed to some positive impact of the revised accreditation regime:

> "We have had to innovate in order to fit everything in - so one consequence of accreditation has been greater integration of theory and practice, and better scaffolding of learning through the course. This has also led to some innovation in teaching and assessment. We are using fewer assessments, but new assessments are more carefully designed to prioritise knowledge synthesis and so are probably much more relevant to pre-service teachers."

Of course this has yet to be fully tested: but it was suggested that while these changes may possibly have taken place without the pressures of accreditation the process "has certainly forced us to rethink what we teach, how we teach and how we assess."

In summary

Anecdotal evidence suggests that a significant difficulty facing providers is the tendency for individual state and territory regulatory authorities to add further requirements to the national Standards and Procedures adding more layers to information requirements or to take more restrictive interpretations than might have been intended. Multiple layers of regulation and multiple jurisdictions for many providers add to the cost and administrative burden. An MOU between TEQSA and AITSL was negotiated and signed in 2015 and TEQSA is currently in the process of entering into MOUs with individual jurisdictions, for example an MOU with the Queensland College of Teachers was signed in September 2016. As this collaborative approach gathers pace improvements may become apparent. However, there appears to be a need for ongoing refinement of the new process in close consultation with all stakeholders, particularly with the Australian Council of Deans of Education who, while valuing the objective of national regulation do have a particularly detailed understanding of the implications for providers. It needs to be acknowledged and implementation needs to allow for the realities facing institutions whose resources and missions are very different. Requirements that pose no difficulties for a metropolitan member of the Go8 may be an insurmountable or inequitable imposition on a regional or multi-state provider whose mission, resource base and student body pose very specific challenges.

The aforementioned TEMAG Report (Section 7.1) observed that the Australian Government, through AITSL led the development of the professional standards and accreditation standards for teachers but also observed: "The challenge now is to make sure this foundation of standards is effectively applied so that it will have a powerful and long-standing impact. The Advisory Group believes that the Australian Government must provide national leadership to address this challenge."

6 STAKEHOLDERS' VIEWS ON ACCREDITATION

6.1 STAKEHOLDERS' VIEWS ON THE BENEFITS OF ACCREDITATION

From the perspectives of all stakeholders there is general consensus that professional accreditation of Australian higher education programs serves many beneficial purposes. Some providers report that accreditation is a cost-effective way of benchmarking threshold entry level programs and therefore do not see it as either a financial or administrative burden. It provides a regular "health check" that supplements internal university processes. Some state that the documentation requirements provide opportunities for "internal reflection" and that assessment visits usually involve external practising professionals who help to ensure employability standards are maintained. Academic participants in accreditation teams appreciate the opportunity to "sharpen reflection on their own institution's programs". The Deans of Arts, Social Sciences and Humanities find that the periodic cycle of accreditation "provides a useful framework for reviewing program content and structure in light of the evolving requirements and priorities of the profession. It also provides opportunities for consultation with key stakeholders, students, staff and industry partners".

The benefits that were cited by and for various stakeholders are summarised below.

6.1.1 Benefits for students and graduates

- conferring on students and graduates, according to their profession, access to provisional and national registration or recognition, access to special arrangements such as provider numbers through Medicare and other forms of public and private insurance schemes, access to membership of professional bodies, and/or access to credentials necessary to practice;
- aiding student and graduate mobility both within Australia and overseas, including potentially improving ease of access to further study or employment in Australia and overseas;
- for disciplines in which graduation from accredited courses is not required for registration or practitioner status external accreditation provides an industry standard "quality mark" that is both recognized and valued by employers and prospective students;
- assuring prospective students and employers of a quality program in the profession and via this assurance providing an opportunity to promote and market programs.

6.1.2 Benefits for the community and employers

- serving a public good through which stakeholders can be assured that graduates of an accredited Australian higher education program meet the criteria and standards for entry into the relevant level of professional practice;

- providing an independent quality assurance process for registration under government legislation and/or membership of a professional association;
- providing, through national and international benchmarking, a guarantee of standing of graduates that is independent of the education provider.
- driving significant economic benefits and the global competitive edge that Australian universities derive from domestic and international student participation.

6.1.3 Benefits for higher education providers

6.1.3.1 Curriculum development and quality improvement

- supporting curriculum design, evaluation and continuous improvement through accreditation frameworks and defined desired graduate outcomes and capabilities;
- providing focus for staff, students and institutions to address curriculum areas requiring change;
- facilitating external guidance around the future of academic programs;
- promoting benchmarking through Interaction with experienced teams of assessors and the opportunity for academic staff to take part in accrediting teams;
- demonstrating that providers have committed to an extensive and ongoing process of self and peer assessment to ensure programs align with current industry practice;
- conferring on the institution a right to use various accredited program logos and to be listed on accreditation agency websites of accredited providers;
- providing a marketable point of difference for higher education programs for professions which are not regulated;
- providing advocacy within the provider for issues which are idiosyncratic to the discipline e.g. special demands of clinical placement management.

6.1.3.2 Promoting interaction between providers, industry and the profession

- promoting networking, advocacy, peer review and educational interaction between higher education providers and professional bodies which progresses both the profession and the programs;
- fostering a robust and ongoing dialogue between professional organisations and providers that ensures collaboration to ensure best practice and innovation in the discipline is managed competently;
- encouraging academic units to maintain strong and effective relationships with their relevant professional bodies and facilitating greater opportunities for teaching and research collaborations.

6.1.4 Benefits for the profession

- protecting the reputation and standing of the members;
- establishing authority over the profession by the profession for the profession;

- requiring the definition of rigorous criteria and standards for entry into the relevant level of professional practice in a specific professional discipline;
- encouraging adherence to a code of ethics or behaviours for the professional discipline;
- enhancing understanding of the discipline within the higher education institution and the wider community.

6.2 DIFFICULTIES CREATED BY CURRENT ACCREDITATION PRACTICES

6.2.1 Overview

Criticisms of accreditation are commonly encountered, and some may have originated and solidified in a time before the standards and processes were as well documented as they currently are, by TEQSA, the HE Standards Panel and the accreditation bodies themselves. Several respondents remarked on improvements they have noted in recent years. In spite of the almost universally cited problems listed below, most providers say that, overall, the benefits of accreditation outweigh the problems.

Some criticisms reflect a significant tension between academic autonomy and professional prescription. The balance between ensuring professional standards and public safety and maintaining scope for academic innovation and autonomy is a difficult one that is usually addressed on a case-by-case basis. Some on the academic side of the argument advocate that there is no place for accreditors' opinions on program inputs such as resources, processes and practices of the institution. Feedback from several universities as part of this review indicates that the issue of 'autonomy' may need further emphasis, perhaps in redrafts of the UA/PA Joint Statement of Principles.

On the accreditation agency side, most major professional accreditation bodies have responded to providers' feedback by increasing emphasis on learning outcomes and minimising prescriptive rules about staffing, content and teaching methods. Nevertheless, there is a grey area where inputs impinge on the ability of the students to develop required competencies and it is legitimate for accreditors to take an interest in them. For example, the members of the Health Professions Accreditation Councils' Forum are aware of debates about outcomes versus inputs in accreditation and support the view articulated in an internal document of the Australian Medical Council: " … an outcome-based approach to health professional education compared to a process/content orientation is not an 'either or' proposition: a complete separation of process/structure and outcome in education program design would be artificial and may not provide for in-depth integrated programme (sic) development nor be readily measurable by accreditors in their quality assurance processes. If institutional development and quality improvement is at stake a rigid outcome approach is also insufficient".

In most cases compromises are reached when providers are able to justify and provide evidence to support their approach. Increasing familiarity with the Higher Education Standards Framework and the development of guidelines such as the joint UA/PA principles for accreditation should assist in the resolution of most problems in this area.

Encouragement (although not regulation or direct intervention) from government for all agencies to move in this direction would not be unwelcome and may be necessary to overcome the weight of the longstanding tradition of independent action. Suggestions for action in this report, such as the development of a code of practice and plain English guide to responsibilities should address this problem.

6.2.2 General impact of accreditation on providers

The impact of professional accreditation on providers varies considerably depending on the accreditation body involved and on the total number of professional accreditations that providers seek. Virtually all agree that, if conducted in an appropriate and transparent manner, accreditation is a beneficial process that is worth the effort expended. However, there are significant problems created by shortcomings in some accreditation practices. The aggregate effect of coping with idiosyncratic and excessive or unreasonable demands for information and compliance from a large number of accrediting agencies can be significant and problematic.

There is a fairly consistent expression of a desire for a more streamlined approach and for greater levels of understanding by professional bodies of the requirements for registration and accreditation and the Higher Education Standards Framework. No doubt this understanding will improve over time but it signals a need for ongoing effort to ensure that accrediting and professional bodies are familiar with the various changes in national regulation of higher education. It also signals a need for increased collaborative effort to ensure that reviewers and committee members for accrediting bodies are similarly aware, given that professional members often rotate frequently, operate in a voluntary capacity and many may not have a large supporting secretariat.

The single issue raised most commonly by providers is the inconsistency between the published position of the professional body as a corporate entity and the position of the various members of the profession (including academics) who actually perform the accreditation tasks.

The most significant burden related to professional accreditation that is cited by most providers is the aggregate burden of the ongoing management and maintenance of accreditation and associated processes. The requirements of professional accreditation vary depending on the accrediting body and it can take anywhere from 6 months to more than 5 years to successfully apply and achieve accreditation. A typical accreditation process involves:

- Initial application
- Submission of a portfolio
- A site visit
- Receipt and response to a final accreditation report
- Annual updates to the accrediting body.

All of these steps have significant academic, administrative and financial implications for the university. Many universities have established central quality assurance and

accreditation units (or similar) to support academic units in the administrative aspects of the task. These units also provide an internal benefit in that they enable alignment of external and internal quality assurance mechanisms. However, the majority of the burden is inescapably carried by senior academic staff and can prove a significant distraction from core teaching and research responsibilities, especially in smaller institutions and academic units without access to a central support unit.

Should an accreditation fail or be revoked there are significant impacts on the students, graduates and the university. The mechanisms by which accrediting bodies manage such outcomes are said to be inconsistent with regard to opportunities to address and mitigate the loss of accreditation. This is a serious shortcoming and signals a need for a code of conduct that specifies national common standards for due process.

For non-self-accrediting providers all of the issues faced by university and self-accrediting providers are amplified in that they must face both TEQSA course accreditation and professional course accreditation. This has the effect of "regulatory double-up" and the 9-12 month TEQSA process for approval must be followed by professional accreditation processes meaning that the timeframe can extend to several years or more with a significant financial and operational impact on providers.

Most providers have a story to tell which reveals both positive and negative experiences. For example, one provider involved in training for one of the therapies described it well, highlighting both the strategies that providers adopt, the benefits of coordination with TEQSA and the consequences for students if compromises cannot be reached:

> "Our organisation has experienced working with three therapist "accrediting" bodies. One of these we have not been able to negotiate with as they have required course content that was not aligned with our TEQSA accreditation nor was it aligned with our approach to therapeutic practice. Our organisation no longer has a relationship with this professional body, and therefore students are no longer able to seek professional membership. In the remaining two cases the professional organisations assumed that since we had been accredited by TEQSA our academic content and modes of delivery and all other accountability related to assessment, student services and so forth was satisfactory and the only area of concern was the professional practice hours and the supervision of these."

Another provider cited an example of an assessment panel whose members had no appreciation of university structure and function and the role played by TEQSA and as a consequence made demands that were outside their terms of reference.

A different provider offered a list of examples of unreasonable demands made by accreditation panels that exceed their purview:

- Excessive requests for documentation including confidential student information, financial records of partner organisations, copies of completed projects submitted by **all** students in a graduating student cohort for the accreditation panel to assess, when these assignments have already been assessed by the University and marks awarded.

- Prescribing specific program/course naming conventions be adopted, including directing the qualification level at which a program can be offered.

- Requiring the recoding of courses (subjects) for a reaccredited program and specifying the wording of a course noting on student transcripts.

- Prescribing the program's learning and teaching practices including specifying requirements for summative examinations as the approach to verifying student learning outcomes.

- Rigidly mandating the composition of the staff team (academic and administrative) employed to deliver and support a program, removing the ability for the educational provider to use discretion and innovation in the way it structures its staff team.

- Taking an authoritative tone in communications and threatening that any non-compliance with accreditation standards will result in accreditation being refused, and as a result, graduating students being prevented from (ever) being able to achieve professional recognition as they would have graduated from an unaccredited degree.

6.2.3 The need for more consistency

One benefit of broader adoption of statements of principles and the expected guidelines for practice from UA/PA would be a greater consistency among accrediting agencies. Consistency is necessary because there are too many ways of asking for essentially the same information resulting in excessive manual handling. It need not impinge on professional independence and autonomy but it could provide a touchstone for guidance when standards and processes are being reviewed. Inconsistencies are many and are mostly unnecessary. They have arisen because processes and policies have, for the most part, been developed in isolation. For example one provider pointed out the following:

> "The lack of any consistency across the provision with regard to terminology used; for example, conditional accreditation, provisional accreditation, accreditation with conditions, qualifying accreditation is disadvantageous as people can make incorrect perceptions about the accreditation status. Disciplines differ around when the accreditation process is to begin for the first time, for example, some accrediting bodies require approval before the first enrolment, whilst others do not wish to see an application until students are in the final year etc. The inconsistency has disadvantages when, again, it is difficult to communicate to students accreditation status."

6.2.4 Specific problems that were cited by providers include:

- Regulatory and financial burden
    - Workload during the time of accreditation which, because of the large number of accreditations that some faculties such as health sciences face, can be very burdensome.
    - Costs to the university. These vary enormously as detailed below.

    - There is room and need to streamline accreditation reporting including sharing reports undertaken for other purposes/quality processes.
    - Greater alignment with TEQSA was noted as a desirable goal as was consideration of alignment with standards and guidelines from the Australian Commission for Safety and Quality in health Care (ACSQHC) and the Australian Quality Framework for the Accreditation Function developed within the NRAS by the National Boards, accreditation authorities and AHPRA.
- Wide variation in format and type of information required
    - Varied requirements of different accrediting bodies necessitate repackaging and reformatting of the same information for different bodies. One provider suggested that "it would be a simple win if staff and student numbers could be presented in one consistent format, for example."
    - Some data are required in formats that are inconsistent with how the institution manages its data.
    - Councils of Deans report that some requests for information border on "commercial in confidence". For example details required have at times included: current balance sheets, student names and projected clinical placements over an entire cohort, projected income, and expenditure statements over a three year period. One profession requires the provider to submit every clinical placement undertaken by every student across the 4-year program.
- Inappropriate intervention in institutional autonomy
    - Some imposed metrics such as student:staff ratios and clinical hours are not supported by any data for their effectiveness although can impose significant costs on the institution.
    - Inappropriate intervention in self-accrediting autonomous institutions' internal management arrangements. Examples are cited where one agency has required changes to school structure and budget delegations and has mandated the proportion of academics' time to be devoted to research.
    - Inappropriate collusion with academic departments to attempt to influence the direction of faculty budgets.
    - A tendency has been noted of accreditation bodies adding the assessment of those regulatory matters that are properly in TEQSA's remit; and to attempt to duplicate TEQSA's assessment of the HESF at the course level, for example by challenging the AQF designations of courses or challenges that a course accreditation framework being non-compliant with HESF after TEQSA had already approved it.
    - Confusion can arise where the professional accreditation of a program makes no distinction in standards between different levels (at undergraduate bachelors or postgraduate masters) where there are such distinctions in AQF (Level 8 bachelors and Level 9 masters).

- Transparency and due process
    - Basic processes such as timelines for reporting, documentation requirements, and site visit protocols and frequency vary considerably in the degree to which they are explicit.
    - Some accrediting agencies have no explicit avenues for appeal or for resolving disputes or ensuring due process or conflict of interest safeguards
    - Lack of an external independent body that is able to assess and mediate specific areas of disagreement between a provider and an accrediting agency.
    - Perceived conflicts of interest when accrediting bodies are not independent of professional associations, especially those that offer their own training programs.
    - There is a perception in some professions that accreditation is about controlling numbers who enter the profession rather than societal or economic need.
    - Professional bodies can sometimes operate like a 'cartel', insisting on supervisors only being approved if they hold registration from the particular accrediting body or insisting on percentage of staff who must be registered with the body, despite many being unable to practice because of full time academic responsibilities.
    - Some accrediting bodies do not allow providers to respond to comments or submissions made by external stakeholders but still use these unchallenged submissions as the basis for decisions or conditions on accreditation. In some cases these submissions or comments are considered "parochial" but the provider has no opportunity to respond.
- Poorly prepared accreditation panels
    - Not all accrediting teams are aware of, or pay due regard to, performance measures such as the Quality Indicators for Learning and Teaching (QILT), other (often institution-based) measures of student success and satisfaction, and contemporary higher education innovations and pedagogical good practice nationally and internationally.
    - Risk of personal bias and undue influence from individuals in accrediting teams.
    - Related to the above almost all providers cite the problems created by assessment teams who seem ill-prepared or who, despite clear guidelines attempt to impose their own "hobbyhorses".

6.2.5 Specific problems that were cited by professional accreditation agencies include:

- Small professions sometimes have difficulty in providing assessors or reviewers who do not appear to have a conflict of interest.

- Accreditation submissions are intended to be reflective analysis by providers of their own programs (sometimes called "self-study reports"), but in the main the submissions tend to be presented as sales pitches.
- Providers that use accreditation consultants to prepare accreditation documentation, whether internal (in education units, for example) or external, do not get much value out of accreditation (especially where external consultants are used), especially if the consultants prepare most of the submission.
- One accrediting agency cited challenges in the realm of its attempts to advance the profession versus what can reasonably be achieved by universities, particularly in terms of practicum requirements and timeframes for achieving them.

6.3 THE COST OF ACCREDITATION

Universities are unanimous in raising the worrying magnitude of direct and indirect costs and the rapid increase of costs in health professions accreditation particularly. The direct cost varies from zero to many thousands of dollars for each profession and/or course. Site visits can cost "tens of thousands" and the opportunity costs in preparing submissions can be considerable. Submissions regularly total more than 1000 pages and accreditation periods vary from annual to five yearly. This appears to be a particular problem in the health professions where it was noted that "many accreditation costs appear to be unreasonably high, especially where more than one accreditation may be undertaken in one visit but multiple accreditation costs are charged".

One provider pointed out that the cost-benefit of accreditation becomes questionable in cases where "…the cost of accreditation can exceed $90,000, the timeline can exceed 18 months, workload requires additional staff appointments in times of fiscal restraint, the accreditation process requires ongoing amendments (accreditation rarely pauses) and the rigidity of accreditation limits course capacity to respond to changing educational opportunities or practice evolution with agile educational responses."

6.3.1 Accrediting bodies' perspective

Small professions and associations/accrediting agencies lack the economies of scale that permit very large professions to be more innovative in their approaches to initiatives such as training expert reviewers or regular monitoring for early intervention. It was pointed out that it costs the same to accredit a course that produces 15 graduates as it does for one that produces 300 graduates. This is a problem for providers as well as accreditors.

The range of arrangements for fees and cost recovery is indicated in the table at Appendix 1.

Some professional bodies with large membership bases charge no fees for accreditation, others adopt a cost recovery approach. In many cases the cost of accreditation is subsidised by fees charged for other services such as international migration skills assessment or professional educational programs. Most NRAS accreditation authorities

are assigned statutory functions (reflected in an agreement between each body and AHPRA) by the registration boards of their professions who are funded by registration fees of practitioners. Charges to providers supplement the resource base of the accrediting councils and aim to recover costs in the fees charged. All but one of the NRAS Accreditation Authorities receive some funding for their accreditation services through their national board and are therefore subsidised by the registration fees paid under the National Scheme. The amount paid varies. All accreditation authorities rely on the "unfunded/underfunded contribution of members of the profession to their accreditation work" (Health Professions Accreditation Councils' Forum submission). Fees charged to providers contribute towards but do not cover the cost of accreditation within the NRAS. AHPRA has provided "ballpark figures" derived from their most recent review which is ongoing. This new costings document indicates that accreditation authorities operating under the National Law spent $10,871,470 on accreditation of programs of study (including the development of accreditation standards) in 2015/16, and that there were 746 accredited programs of study across 338 education providers.

The Architects Accreditation Council funds accreditation through a combination of funds from providers, architect registration boards, the Accreditation Council itself and the Australian Institute of Architects. Such complex funding arrangements share a common problem of lack of transparency. Some agencies are aware of this and are taking steps to increase transparency to help providers and others better understand the basis of the fees they charge.

An example of recognition and mitigation of the cost burden by accrediting agencies is provided by the Australian Veterinary Boards Council which conducts accreditation simultaneously with the Royal College of Veterinary Surgeons and the South African Veterinary Council, requiring only one set of documentation and one fee ($80,000). However, direct costs of accreditation of Veterinary Science courses involving an international visit can exceed $150,000 and identification of significant deficiencies can trigger extra site visits. Another example is the Australian Dental Council which has streamlined the accreditation for postgraduate specialist training degrees such that all degrees are covered by one site visit. The provider pays an annual fee of $5000 per course to maintain accreditation.

6.3.2 Providers' perspective

One university summarised the major issue with respect to resourcing "[T]he true cost burden is in processes that make a less effective contribution to [our] own quality assurance and accreditation. In these cases, at least some costs are unproductive but unavoidable… A significant issue is where more than one professional body provides accreditation for the same course. This circumstance results in additional costs without providing any significant value to the course itself."

Depending on the nature of the programs offered the resource use and fees can add up for some schools placing significant burdens on their teaching budgets. For example, one university reported that some of its schools may each face a cost of $100,000 in any given year to cover accreditation application fees, while other schools may pay only nominal fees. Added to this is the cost of site visits (which can run into tens of thousands) and of

the considerable staff time involved in developing submissions and responding to reports. Another university reported that it spent in excess of $275,000 in 2015 on health professions accreditation alone and that was almost a 300% increase over the 2010 – 2015 period. In one Health discipline, one university "dedicated at least 50% of the workload of the professorial lead for a period of 18 months (an estimated $160,000) to address ongoing, and in the University's view, unreasonable requirements of a single accreditation agency".

A smaller regional university estimated its direct accreditation fees amounted to half a million dollars over a five year cycle excluding indirect staffing and administrative costs. Another small regional university with a strong program in health and education reported the costs of a recent nursing accreditation as over 800 hours of a level D academic, plus professional staff who supported development of the portfolio, 200 hours of "fieldwork" to gather required data and information for inclusion in the portfolio and over $90,000 in fees and site visits. Another university reported that Nursing accreditation almost necessitates the employment of a part-time staff member to continually work on some form of accreditation and any modifications. Accreditations in Nutrition and Dietetics and Occupational Therapy each required 300-400 hours of senior academic staff time, time to support 3 day site visits, and $15,000 - $20,000 in site visit costs.

Business Schools in general seek international accreditation from bodies such as EQUIS (European Quality Improvement System) which costs approximately $100,000 every 5 years with an additional annual fee of $10,000. International accreditation by AACSB (The Association to Advance Collegiate Schools of Business) is similarly expensive. Some heads of Psychology programs report that the cost of the process of Psychology accreditation can be as high as $150,000 not including staff time. An analysis by HODSPA (Heads of Departments and Schools of Psychology Association) has calculated that nationally this amounts to at least $1.2 million per year or an amount of $1,000 for each student enrolment.

The logistics and costs of site visits can be quite daunting. For example, one large metropolitan university cited an example of a major accreditation in a technical profession which required the involvement in the site visit of 180 staff, 25 industry representatives, 40 alumni and more than 50 students. This same institution has estimated the cost of accreditation with Engineers Australia (counting staff time as well as fees) in the vicinity of $250,000. One School of Architecture and Design paid over $20,000 just to cover the cost of the visiting accreditation panel in addition to the fee payable to the accrediting agency.

Accreditation documentation itself may comprise hundreds of pages with additional data-heavy appendices running into thousands of pages. If required in hard format, as many are, this adds substantial printing costs. One accreditation was recorded as requiring 300 pages of written text as well as copies of student placement agreements and appendices which numbered in total over 1000 pages, and multiple copies were required.

These costs are a significantly higher impost on smaller regional institutions than they are on major metropolitan institutions who have a better developed infrastructure to cope but also for whom the travel costs associated with site visits are likely to be much lower.

The Australian Council of Deans of Health Sciences deals with both regulated and self-regulating health professions' accreditation and observes that there is limited transparency in how fees are determined. Cost structures are so variable that there is no meaningful way to compare them. One member notes an increase of 300% in the 5 years from 2010 – 2015 while another estimates the costs associated with preparing for program accreditation and site visits is around $100,000 to $200,000, meaning five-yearly costs are in excess of $1.5 million (accreditation is generally a five-yearly process) or $300,000+ a year. Costs are added for each site on which a program is offered. Against this it should be noted that prior to the introduction of the National Registration and Accreditation Scheme for some health professions in 2010 some professions included in the scheme did not charge fees. In addition the new Scheme imposes higher expectations for monitoring accreditation providers and reporting to National Boards which have increased costs. The Scheme does impose accountability for accreditation fees charged and requires justification for fee charging principles.

6.4 IMPACT OF ACCREDITATION ON INTERNATIONAL STUDENTS/GRADUATES

The English requirements for student visas were amended in 2011 to include 3 additional global English Language proficiency (ELP) tests including the TOEFL iBT® test. All Australian universities have accepted TOEFL iBT test scores for admission for many years. However, fewer than one quarter of all international students in Australian universities use an IELTS or TOEFL test to enter their course directly. Most enter through pathway programs (English, Foundation, Diploma) which use internal assessment, or through other channels such as study in English in the student's home country, all of which are deemed to be equivalent to the standardised test results.

The ELP requirements for skilled migration and post study work visas were amended in 2014 to include the same additional global ELP tests[16].

These changes to the approved Department of Immigration and Border Protection (DIBP) ELP tests occurred after a very long and complicated exercise that commenced in 2008 and involves 24 benchmarked standards.

Most international graduates in professionally approved academic programs in Australia cannot commence their professional career until they meet the ELP requirements of their application for professional registration. ELP test requirements for professional recognition usually require ELP test scores that are less than 2 years old – shorter than

[16] https://www.border.gov.au/Lega/Lega/Form/Immi-FAQs/aelt

the duration of the average degree. This means most students need to test or retest to meet ELP requirements in spite of having studied in an Australian higher education provider for several years. Almost all professional bodies require higher ELP levels than the post study work visa they may be using.

A few professions accept course graduation as a proxy ELP assessment. In some professional areas, the university course admission ELP requirement for a program is set at the ELP requirement for professional recognition but this varies by institution and not all institutions have that requirement even within one discipline, (eg nursing).

In many cases, eg accounting, the university admission requirements are lower than the professional requirement meaning that there are international graduates who can't meet the ELP professional requirements when they graduate so they cannot be registered professionally despite meeting course requirements. In the views of some who are familiar with English language testing some ELP requirements for professional recognition seem to be set rather high. This is attributed to a culture of 'we need higher so we don't have any problems'. Professions Australia has commenced discussions with ETS Global on whether a guideline can be developed with respect to English Language Proficiency.

6.4.1 Steps taken by the Professional Bodies

Three major professional groups - Accounting bodies, AHPRA, Engineers Australia - have set new English requirements which include some or all of the newly approved English tests. These professional organisations have gone through a long internal process to reach this decision.

Educational Testing Service has been attempting to address this issue with other accreditation agencies on students' behalf without success since mid-2014. The result is that many other accreditation authorities (eg teachers, architects, dietitians, surveyors, lawyers) have not broadened the range of ELP tests they will accept despite the language tests for visa regulations changing in 2014. Teacher registration is the issue most commonly raised by international students. AITSL refers enquiries or complaints to the state registration bodies. The Victorian Institute of Teaching (VIT) took the lead among states to identify where the professional ELP requirements had been determined. However VIT has not proceeded with the issue for the past 18 months.

The net effect is that international graduates may have entered their course with a TOEFL iBT test score, for example but be forced to undertake an IELTS test to get professional recognition. This creates an additional barrier from the international graduate's perspective.

It should be noted that not all professional bodies have ELP requirements. A few professional bodies use the ELP visa requirements if the graduate applies for a skills assessment, eg ACS. A few specialist groups such as the Civil Aviation Authority have their own ELP processes.

The issues of professional recognition for international graduates overlap with skilled migration as the same professional bodies are dealing with both groups for the registration process. As part of the DIBP skilled migration application, a skills assessment must be completed before a skilled visa application can be made. Around 40 professional bodies are approved by DIBP as assessing authorities for skilled migration[17]. This process occurs as a compulsory step before an international graduate can apply for any skilled migration visa, either temporary or permanent. There appear to be many inconsistencies in this process which may worsen with an imminent review of the system. However, skilled migration assessment is beyond the scope of this review.

It is not surprising that most professional organisations do not have the expertise to set requirements in English proficiency. Free services are available from ETS and others for the provision of advice in standard setting and testing for English language proficiency in professional settings. This would have the added benefit of improving transparency and reassuring students that the process is equitable.

6.5 IMPACT OF ACCREDITATION ON INNOVATION IN COURSE DESIGN AND FUTURE-PROOFING

The impact of accreditation on innovation depends heavily on the profession involved. There is considerable variation along a spectrum from explicitly encouraging innovation to explicit prescription of inputs and "policing compliance with current standards". There is an increasing tendency towards the innovation end of the spectrum. One university described it succinctly: "Some accrediting bodies work well with the University and take a 'big picture' approach, enabling programs to grow and develop as long as the broad objectives of the accrediting body are met. Such a constructive approach leads to genuine value adding. Others are more prescriptive in their approach to accreditation, which can create inflexibility in program delivery and innovation".

Professional bodies may apply more demanding and prescriptive input standards on non-university higher education providers than they do on universities, leaving little room for flexibility. Members of the Australian Council for Private Education and Training (ACPET) feel that the "default" position is mostly one of highly prescribed course content, delivery mode and staffing. An overall view is that professional bodies impose higher standards than TEQSA for course accreditation and these tend to expand over time. This tendency makes innovation in course design more difficult and the prolonged and uncertain processes make the risks and costs associated with innovation significant.

Generally, innovation is constrained, but not prohibited. Constraints are understandable in professions where public safety is a major concern. Virtually all informants for this report were aware of the risks of both over-emphasising innovation and excessively inhibiting it. The accreditation agencies who are models of good practice address this tension explicitly in their documentation and encourage flexibility and innovation, sometimes by hosting regular education forums where innovative practice is discussed.

[17] https://www.border.gov.au/Trav/Work/Work/Skills-assessment-and-assessing-authorities.

Most are also encouraging flexibility and innovation because it is seen as the job of professional associations (many of whom also accredit) to foster innovation in the professions. Both providers and accreditors say that accreditation at its best is an enabler of appropriate innovation. On the other hand providers also cite those accrediting bodies (for example, some Law Admissions Boards), who are restrictive and conservative in their approach as making innovation difficult, while others continue to constrain the use of innovative pedagogical techniques such as simulation. The health professions also note that accreditation needs to support, rather than hamper, greater opportunities for inter-professional learning including in non-traditional settings as this will be an increasing requirement for the future health workforce. The objectives of the NRAS include enabling innovation in education.

A few large professions are still trying to find the right balance between prescription and innovation and providers are aware of which professions create the greatest difficulties for them in this regard. There is considerable consistency across the sector in the identification of professions that pose this problem. They are not identified specifically in this report as it is intended to be an overview rather than a specific evaluation of individual practices. The tables provided in Appendices 1 and 2 provide some indication of the levels of flexibility provided in accreditation criteria.

One Nursing School gave a balanced summary of the situation:

> "On one hand it certainly provides impetus to review and revise curricula on a frequent basis and ensures that the process is done rigorously and is evidence based and well documented. I believe as a result of this we in our discipline have been encouraged to design curricula (sic) that is both innovative and often ahead of other non-accrediting courses in the University, particularly in relation to processes around curriculum design, delivery and assessment. However once the curriculum is designed we are locked into it in its infinite detail unless we notify ANMAC of any changes made during the period in which we are accredited for (5 years). These notifications are associated with a cost both in monetary terms as well as in resources and therefore do not encourage a continuous improvement ethos within that accreditation time frame. Whilst I can understand the need for these notifications in relation to content and learning outcomes, the structure of how we deliver the content and design associated pedagogies and assessment should be able to change without notification as new advances become available. This is after all our core business as a university, and shouldn't be, I believe, controlled in such a way by accrediting bodies."

In some disciplines, considerable portions of the curriculum are defined by input requirements, which can stifle flexibility and innovation in curriculum design and constrain opportunities for providers to differentiate themselves. For example, law faculties are generally unable to provide accelerated degrees to students as a result of the minimum calendar study time required for external accreditation. The prescribed nature of many degrees also makes it difficult to combine them in double degree programs which could prepare graduates for broader scope of practice and future community

needs, or to allow fast tracking of students who demonstrate prior abilities and achievements that satisfy some learning outcomes.

The greatest difficulties appear to reside in those areas where work integrated learning and learning outside the institution are critical aspects of the program. It has been suggested that TEQSA/HESF and perhaps UA/PA should address these areas specifically in the formulation of guidelines for the advice of both sides. Many providers look to future development of an evidence base to help inform decisions by accreditation bodies about innovative approaches to learning and teaching: for example under what circumstances are simulations effective and how can engagement in work integrated learning be monitored? With the demise of the Office of Learning & Teaching it is not clear where the impetus for collaborative research in these areas will come from.

Specific problems for innovation are cited as:

- Accreditation requirements can be prescriptive to the point that innovation in particular with respect to clinical or work integrated learning opportunities is curtailed.
- The uncertainty/pressure staff and students experience when undergoing the accreditation process which determines the future of the program can lead to "playing it safe" and avoiding non-traditional approaches.
- Some accrediting bodies can suppress innovation through practices such as requiring 'any' changes to an accredited program to be notified to the accrediting body (at times, with a significant evaluation fee). Clarity and consistency around the definition of 'major change' or 'significant change' would be helpful.
- Accreditation cycles tend not to encourage rapid change which may make it difficult for universities to respond in the current operating environment.
- Accreditation can impact on innovation by limiting the types of assessment that can be used. Introducing innovation in assessment (for example, oral presentations) and how that information is presented (such as ePortfolios and work-integrated learning) may also be difficult where a print submission is required for accreditation.

Innovation is possible where effective relationships between providers and professional accreditation bodies are maintained. Properly structured accreditation cycles provide relatively regular opportunities for innovation and change in response to emerging trends and priority areas. The other side of the coin, however, is that the cost associated with designing a major change in a curriculum which necessitates re-accreditation or review can be a disincentive for innovation, especially if funding for higher education becomes tighter.

The problems associated with future-proofing the professions have not escaped the attention of either providers or accreditors. Many explicitly state that their accreditation guidelines are designed to encourage innovation and diversity and 'non-core' learning and thus prepare students for an unknown future. On the other hand one respondent pointed out that innovation is more easily achieved in established programs than in those

seeking initial or provisional accreditation which experience "greater pressure" presumably towards conformity.

With regard to future-proofing one university noted that: "…[t]he opportunity cost of accreditation may lie in the extent to which it replicates disciplinary norms, cultures and habits at a time when new modes of work, changing graduate destinations and a tight resource environment are features of the context in which courses are offered".

Another pointed out that: "[W]here accreditation has the effect of narrowing the curriculum it is not useful at a time when universities are thinking more globally and developing degree programs which allow for inter-disciplinary, multi-disciplinary and entrepreneurial experiences… a university professional program which is only matched to traditional careers/pathways does not align with the reality of students and graduates being able, and encouraged, to adapt their skill sets to new professional applications. Universities prepare students and graduates for careers beyond the narrow idea of their degree".

Aware of these issues, some agencies (Engineers Australia was cited specifically) actively encourage innovation. The CPA, conscious of frequent criticism that accreditation stifles innovation and diversity, reviewed the accounting programs of 20 universities in Australia and 3 in New Zealand and found that there was no excessive conformity in prescribed textbooks, or uniformity in core subjects taught and that there was sufficient opportunity to undertake elective study outside the business faculty. The Australian Veterinary Boards Council hosts an Education Forum every two years, the principal objective of which is to ensure innovation and advancement to meet future needs of the profession. The next Education Forum will be held in December 2016 and AVBC has appointed a futurist for a broader scan of society and the veterinary profession with the aim of developing strategies to ensure standards stay relevant and innovative. The desired outcomes from the Education Forum are to ensure veterinary education and accreditation meets the requirements of society and the profession to year 2030.

Most see that the best safeguard for the future is continued close contact with the professions themselves. Strong links with the professions and registration boards allows feedback, for example from issues raised as complaints by the public. Industry advisory panels play a part in the accreditation process as well as the course design process for virtually all professions, while all involve a mix of professional practitioners, academics and community input in the development of their standards. One respondent described the underpinning necessity succinctly: "Innovation and responsiveness requires close connections between all bodies, and the development of partnerships that are mutually respectful of the values, history and epistemologies of all parties*".*

Cross-sectoral collaboration is seen as not only desirable but necessary and is common practice in setting standards, designing courses and conducting quality assurance and accreditation and conducting regular updates. For example, a major revision of the Engineers Australia Stage 1 Competency Standards was a collaborative effort by the Australian Council of Engineering Deans, Engineers Australia and the Australasian Association for Engineering Education with support from an Australian Learning & Teaching Council grant.

Another strategy recognised by many is to ensure that the non-technical aspects of professionalism are well covered in learning outcomes because it is the technical aspects of practice that are most liable to radical change in the future. Alongside this is a strategy to move away from a prescriptive approach and reduce core skills down to the absolutely critical technical skills, leaving more space for flexibility outside the core. Space in the curriculum for flexibility beyond essential content continues to be a problem in many mainstream professions and can limit diversity. Particularly where accreditation is a jurisdictional responsibility some jurisdictions are more reluctant than others to accept alternative delivery modes such as online and consequently some providers are reluctant to experiment in those professional degrees.

An important plank in future-proofing and updating is mandatory, regular continuing professional development that incorporates non-technical 'soft skills'. Alongside this goes the necessity to develop better ways to assess and monitor the 'soft skills'. Some enlightened accrediting agencies regard as a sign of risk any program that pays inadequate attention to non-technical aspects of the professions.

Some sound a note of caution that, especially in the health fields, government policy imperatives attempt to influence accreditation criteria towards preferred strategies such as inter-disciplinary education or use of simulation which may, in some cases, be inappropriate. These imperatives claim to be about future-proofing the workforce and improving use of resources but there are significant limits, and without a clear evidence base as to the goals being sought or the effectiveness of policy priorities, agencies and providers are reluctant to 'cram' still more into already burdened curricula. On the other hand it has been pointed out that "[T]he discipline-specific nature of accrediting bodies makes it difficult to offer a more inter-disciplinary curriculum, despite a multi-disciplinary approach being the current trend in health. It limits and discourages different disciplines to work together, particularly in areas of emerging importance to the Australian community such as primary care, prevention, mental health and the management of chronic disease". As in all things appropriate balance needs to be arrived at by negotiation between stakeholders.

7 GOOD PRACTICE AND EMERGING TRENDS

7.1 ELEMENTS OF GOOD PRACTICE

There is considerable agreement across both providers and professional bodies about the elements of good practice and these views are summarised below.

A couple of universities identified the Australian Medical Council and Engineers Australia as exemplars of good practice because of their focus on quality improvement and transparent outcomes. Occupational Therapy and Speech Pathology were also praised for their support of innovation and their low level of prescriptive requirements. The Royal Australian Chemical Institute and the Australian Institute of Physicists, among others, were cited positively for their alignment of requirements with the Higher Education Standards Framework. Examples of poor practice are accrediting bodies that take a rigid approach to course inputs rather than outcomes (even down to the content of feeder undergraduate programs), have poorly defined standards, short timelines for reporting, administrative complexity, changing expectations, poorly prepared teams, lack of consistency and lack of an appeals process.

Providers in those professions that do not yet have a common national set of processes for accreditation (law, Initial teacher education, architecture) indicate the need to move quickly in that direction. Responses indicate that "(A) single set of standards with the same evidence and paperwork accepted by all relevant [jurisdictional] players would be the best outcome. In the absence of this, greater clarity around demarcation between the role of government standards and those of professional accreditation standards would be useful as a refusal by each to rely on the judgment of the other leads to duplication and costs."

7.1.1 Communication among stakeholders

One of the most important elements of good practice is enunciated in the UA/PA Joint Statement which identifies the need for a clear and shared understanding of the roles of universities in designing and delivering courseware and the role of professional bodies in recognising the skills and attributes necessary for graduates to succeed in the relevant profession.

The importance of good communication flow between accreditors, providers and other stakeholders was stressed by many informants for this project. Some accreditors provide comprehensive guidelines and "someone at the end of the phone". Some provide lists of questions that will be asked of various groups at the site visit. The Australian OHS Education Accreditation Board provides a face to face or online briefing prior to providers' preparation of the application followed up by telephone support and a debriefing following delivery of the accreditation report to discuss the action plan and

any issues. Where accreditation is not awarded a clear action plan is provided with timelines for re-application.

Feedback from providers and assessors after the accreditation process is generally regarded as desirable to close the feedback loop. Most accrediting agencies are willing to work with providers to identify and rectify potential gaps and to provide support in completing documentation and understanding requirements. Some even provide "accreditation consultants".

One provider described succinctly the ideal process while noting its variable implementation: "Ideally, the accreditation process will be collegial, supportive and provide constructive feedback to improve educational outcomes. This has been our experience in a number of cases, including for example the Australian Medical Council, which recognises that there are different means through which a university might demonstrate that they are producing safe and competent graduates. Others are more single-minded in their approach".

It is common practice for Deans' Councils and accreditation authorities to meet to discuss issues arising from cycles of accreditation and upcoming accreditation changes, trends in course development e.g. transition to entry level graduate degrees, and fee structures.

There are many examples of activities whose goal is to increase communication and collaboration. For example in 2015 the accreditation councils for chiropractic, medicine, nursing and pharmacy worked together on a workshop on inter-professional education which looked at the barriers and enablers for inter-professional education and there was a strong education provider input to the workshop. In 2016 the Australian Physiotherapy Accreditation Council, the Council of Physiotherapy Deans (ANZ) and the Australian Physiotherapy Association co-hosted a National Physiotherapy Prescribing Summit. The Exercise and Sports Science Association instigated an annual two day meeting which is now convened by the Council of Heads of Exercise, Sport and Movement Science and provides an opportunity to present industry and course accreditation updates and to collaborate with academic stakeholders.

All forms of accreditation require clear communication of expectations and training to ensure that assessors and committees are familiar with the standards and processes. It is reasonable, from our analysis of the published processes for accreditation, to conclude that most agencies are aware of the need for clear communication to providers and members of accreditation teams but for some, especially in the smaller professions, the logistics can be a challenge. Most major accreditation agencies have very comprehensive guidelines including model agendas and schedules for site visits, templates for assessment reports and a requirement that at least one or two members of assessment teams are experienced. Larger agencies ensure that an experienced member of the secretariat accompanies every team. Formalised training is less common although in Psychology assessors undergo a process whereby they become qualified as assessors. The Pharmacy Council has produced an online module for training of assessors that is generalizable and is freely available. Another strategy that bears examination is cross-professions training of assessors, especially in cognate disciplines and especially for non-technical skills.

Nevertheless it is a common complaint among providers that assessment team members sometimes exceed their brief or seem preoccupied with their own "hobby horses". Accrediting agencies acknowledge this problem and attempt to filter out problematic behaviour, as well as establishing systems of induction and training. For some the logistics of preparation of essentially volunteer assessors is a challenge, for others there are generational issues where assessors may be expert in their discipline but not cognisant or approving of modern educational trends.

7.1.2 Outcomes based accreditation

Most accreditors are moving or have moved in the direction of core competencies and learning outcomes based standards and criteria.

However, in order to be effective for accreditation purposes, outcomes based assessment assumes a "mature environment" which may not be the case for all smaller or non-self-accrediting providers. A big issue for some accrediting agencies and for TEQSA is that private providers 'at the bottom end' do not put the quality systems in place. This also applies to some providers who partner with universities. This is where risk-based assessment becomes important.

While most professions have subscribed to the concept of outcomes-based education there is an increasing realisation that increased depth of understanding of the concept and its implications is needed as well as more sophisticated techniques and technologies for mapping programs to accreditation requirements. One major accrediting agency reported that it is redeveloping its reporting templates to facilitate this mapping.

Some respondents from smaller and perhaps less well understood professions or professions at the intersection of several disciplines such as Art Therapy or Music Therapy, while welcoming better approaches to learning outcomes and quality assurance, also signalled caution that accreditation forces could "funnel" them into standard patterns of training and practice that would lose their special value and expertise. For example, in inter-disciplinary therapies some accreditors might privilege verbal counselling over visual or creative modes of therapy and consequently try to influence course outcomes and structure in that direction.

It was also pointed out that an outcomes focus is not always well supported by the available data. For some, especially those in the professions which have a strong 'relational component' which is dependent on interpersonal interaction, the advent of regulation that requires robust evidence of outcome achievement poses a major resource problem. One such provider characterised it as a challenge of assessing relational therapeutic processes – when (within our world view) many of these processes are held within the relationship rather than observable actions of the trainee practitioner. A significant boost in professional development has been required for staff which again has financial implications for the organisation. Underneath this is an issue of what constitutes appropriate evidence.

7.1.3 Evidence-based monitoring and risk assessment

The majority of accreditors employ some form of self-assessment reporting model on an annual basis and for accreditation applications. Some engage the providers themselves in developing the types of evidence that will be sought to assure standards are achieved and to present that evidence as part of a narrative.

Risk based assessment for accreditation requires 'right touch' monitoring, currently an area that is acknowledged to need further development. It is also an area where collaboration among accreditation agencies, higher education providers and TEQSA would be most beneficial. Under a right touch model higher risk providers would be subject to more frequent or more intensive visits and reviews while routine monitoring of data driven annual reports with focused reviews could be a better use of resources for low risk providers. Regular monitoring allows intervention at an early stage when risk is identified. Monitoring can also be focused around a particular theme that might be identified from multiple sources of evidence. It should, however be noted that sharing of risk assessments has limitations in that risks that are pertinent to professional concerns and competencies may differ from risks associated with the institution *per se*.

Many accrediting agencies retain the model of accreditation for a fixed term (most commonly 5 years) accompanied by annual reporting of any changes to the program or staffing and/or reporting of standard metrics of performance. A smaller number have an initial accreditation with annual reports and full reviews of accreditation status are only triggered by major changes or evidence of problems. This is an approach adopted in many industries where initial accreditation serves as a baseline. Regular specified data driven and exception reporting on an annual basis identifies areas of risk with scheduled reviews to ensure that things remain on course. Subsequent full-scale accreditations are triggered only by an event or critical incident rather than simply by the expiration of time. A few larger agencies are also beginning to consider the merits of this approach.

7.1.4 Negotiation of International accreditation

Most members of large global professions have established or are negotiating some form of reciprocal recognition with overseas accreditation agencies. Both accrediting agencies and providers welcome the emergence of this internationalism that was said by one respondent to have "changed the terrain".

Several accrediting agencies pointed out that providers might not recognise the degree of effort accrediting bodies expend in maintaining these international relationships for their benefit and the benefit of their graduates.

International recognition is particularly critical to allow Australian graduates to enjoy international mobility. A further benefit is the increased potential to facilitate international student exchange programs. In disciplines such as Veterinary Science, Dentistry and Medicine considerable effort is expended in gaining mutual recognition with countries such as USA, UK, Canada and NZ partly because those countries can be a source of fee paying international students who wish to be registrable in their home countries. Another benefit of mutual recognition with the US for both students and

providers is that it renders US students eligible for US government loans. To achieve this, the accrediting bodies themselves must be accredited and re-accredited by the US Department of Education every 5 years.

The Australian Medical Council is seeking recognition by the World Federation for Medical Education (WFME) that has developed Guidelines for Accreditation and a process for evaluating accreditation programs and agencies. This has been stimulated by the Educational Commission for Foreign Medical Graduates' (ECFMG in the USA) recent policy announcement that from 2023 ECFMG certification will only be available to medical graduates from schools that are accredited by a formal process that uses globally accepted criteria such as those established by the WFME. Similarly, the Australian Dental Council is exploring membership of the International Society of Dental Regulators which covers 15 jurisdictions but is in the early stages of development. The Architects Accreditation Council of Australia has mutual recognition agreements with New Zealand, Singapore and Hong Kong and is in discussions with Malaysia.

Engineers Australia was one of the original signatories to the International Engineering Alliance's Washington Accord in 1989 in which 6 countries (now 18) agreed to recognise each other's accreditation processes. The Australian Computer Society is a signatory to the Seoul Accord with similar benefits. Through such international agreements graduates from programs accredited by the signatory accreditation agency are granted equivalent standing in the jurisdictions of all signatory countries, enhancing graduate mobility and employer confidence. In Engineering program equivalence is established and reviewed by rigorous peer-based processes referenced to outcomes-based Graduate Attribute Exemplars and process requirements. This is also a critical benchmarking process. The Washington Accord is seen to be worth the effort of participating in that it also assists local compliance. The two international engineering accreditation bodies, International Engineering Alliance (IEA) and the European Network for Accreditation of Engineering Education (ENAEE), have published a joint document on engineering best practice that is widely used as a resource[18].

These international agreements can also have benefits in improving the process of national accreditation. For example CAANZ/CPA use accreditation by the international agencies AACSB and EQUIS as a benchmark which allows them to take a "more streamlined" approach to accreditation of a provider, and benchmark their accreditation guidelines to the International Education Standards identified by the International Federation of Accountants. EQUIS requires the School to undertake a quality self-review of all its operations on a five-year basis. This is regarded as a useful platform from which the school can progress to develop future strategic planning. The review visit is an in-depth consultative process with a panel of international academic and industry personnel. AACSB is a value-add process that provides structure for identifying individual program graduate attributes and approaches to their assessment.

[18] ENAEE IEA Best Practice in Accreditation of Engineering Programmes: An exemplar. 13 April 2015. http://www.ieagreements.org/Best_Prct_Full_Doc.pdf?7325

Singled out for adverse comment about restrictions on students being able to gain international experience were teacher education and nursing and midwifery whose placement requirements are so strict that many overseas placements are not acceptable.

Another example of the efficiency benefits of international agreements is evident in the veterinary area where the various international requirements for self-assessment reports in veterinary science have been 'harmonised' by the Australian Veterinary Board Council to reduce workload and cost for providers. This was achieved by the formation of the International Accreditors Working Group (which comprises the US, UK and Australian veterinary school accreditation bodies). This has resulted in the schools undergoing a single accreditation visit every 7 years rather than three separate site visits. The savings achieved are estimated to be in the order of $250,000-$300,000 per 7 year cycle. Currently the AVBC loses $60,000 - $80,000 per year due to accreditation activities and the shortfall is picked up by state and territory boards out of registration fees paid by practitioners.

In Law the standards for recognising Australian law degrees are set largely by reference to the needs of the relevant jurisdiction and sometimes free trade agreements with Australia (e.g. Singapore). However, Australian graduates are often required to undertake substantial additional studies in local law in order to be able to practise in some countries. Some countries also do not recognise Australian double degrees. There is no consistency between key jurisdictions for Australian law graduates (e.g. US, UK, Hong Kong, Singapore, Malaysia and India) so it is difficult to envisage a harmonised system. Questions are, however, rarely raised about the quality of Australian legal education with concerns mainly relating to limiting the number of lawyers in a country or ensuring sufficient knowledge of local laws and conditions. Some universities arrange international recognition of their programs individually.

A countervailing problem, however, is that some accreditation bodies actively discourage students undertaking aspects of their education offshore (e.g. many health accreditation bodies will not allow students to count clinical training placements undertaken at sites outside of Australia or under the supervision of professionals who are not registered under the National Registration and Accreditation Scheme). One university pointed out that this Australian-focussed accreditation approach results in accreditation "nationalism" throughout the profession globally, and encourages offshore accreditation/registration bodies to decline opportunities to mutually recognise Australian qualifications and limits the opportunity to further develop education as an export.

7.2 EMERGING TRENDS IN ACCREDITATION

Most providers have noted with approval an increasing trend for accreditation criteria to be aligned with the regulatory requirements of the HESF, TEQSA and the AQF, with a greater focus on outcomes and less prescription of inputs. Accrediting agencies that are forward looking are flexible in their self-review and submission requirements.

One respondent from the health professions noted that "[t]he standards for accreditation have at times appeared higher than within-institution standards but are now, generally congruent with the HESF and include areas such as quality assurance, academic governance, risk mitigation and significantly higher regulation of work-integrated learning".

Several emerging trends deserve specific mention:

- An emerging trend which presents more of a challenge to the sector is the increasing number of individual courses that are accredited by more than one professional body. Conversely there is also a problem with the increasing number of courses that are accredited more than once by the same body – as in the case of international program offerings. These trends will increase as inter-disciplinarity increases and the boundaries between disciplines blur and as globalization and international cooperation in education increase. One respondent suggested that universities could play a role in brokering collaborative accreditation processes between professional bodies.
- The health professions regulated under the NRAS are progressing towards harmonisation with common domains with similar standards being proposed in recent standards and draft standards and accompanying evidence guides. This may, however, come at a cost. While previous iterations of standards followed the HESF closely, the Council of Deans of Health Sciences notes that COAG has suggested cross professional work towards alignment of accreditation protocols and this has caused a regression by some to a format, structure and style that is less obviously aligned to HESF and more aligned with some older forms of standards, e.g. replacing student participation and attainment with patient safety as the first domain.
- Capstone subjects or research projects are emerging as a method for ensuring important learning outcomes, and accreditation panels are increasingly placing emphasis on inspecting these methods as the best assessment of the students' ability to integrate knowledge and skills. This has been pointed out, however as also a risk factor in that it could stretch the demands on the capstone and reduce the ability to assure learning in a meaningful way. Other such methods that are increasingly a focus of attention are work-placed learning and reflective journals. As working environments are changing both providers and accrediting agencies are faced with the need to adapt to the provision of experience in real world practice environments. Some providers comment that several accrediting agencies continue to incorporate so many compulsory elements (for example, stipulated requirements for content, work placements and face-to-face time) that the ability to offer distinctive education that reflects a particular institution's mission is inhibited.
- In the case of new mixed mode delivery technologies and paradigms such as MOOCs the current approach is to put the onus on the educational provider to provide the evidence that assessment of learning outcomes is rigorous. Some providers express frustration with the lack of familiarity with these methods represented in review panels who tend to prefer traditional face to face approaches to classroom teaching. Some providers are beginning to invite

accreditation panel members to log into their learning management systems so they can "experience some aspects of what it is like to be a student."

Other trends noted by respondents include the expansion of the number of disciplines undergoing accreditation, the impact of increased competition in the sector and increasing quality assurance demands. Some note an increase in political pressure and expectations for specific workforce outcomes. The increased emphasis on evidence of outcomes in increasingly resource pressed contexts is frequently mentioned. Several also refer to concerns about the production of excessive numbers of graduates who may not find employment.

7.3 OPPORTUNITIES FOR IMPROVEMENT

Various suggestions were made for improvements. One summed up the most optimistic hope tempered by a pessimistic, but possibly accurate, appraisal of its potential for achievement:

"The burden on institutions would be substantially reduced if the requirements for regulation and quality assurance were standardised. Whilst individual disciplines will have specific requirements that must be met, the governance and quality assurance requirements should be the same for regulators and professional accrediting bodies. Given the independence of professional bodies, this is unlikely to occur."

Some suggestions for improvement appear to be contradictory but that is a reflection of the diversity of the field and of the varying perspectives and experiences of providers and accrediting agencies. Some suggestions may not be feasible or universally desired. However, to keep faith with respondents and to reflect the diversity of opinion, we have included all suggestions that were provided in the following summary. Related suggestions are grouped under subheadings.

In principle, the opportunity for improvement that is likely to have the greatest impact is the promulgation of a common good practice framework within which all accrediting agencies can operate. This framework would clearly delineate those areas of educational programs that can be assumed to meet the required standards because the provider is registered by TEQSA, and those aspects of course accreditation that are complementary and are the standards and expectations that are properly the province of the professional body. Other elements of the framework would essentially encompass those principles already identified in the Universities Australia/Professions Australia document. Of particular note is the need, already identified by UA/PA to ensure that professional accreditation standards required of providers should have an evidence-and/or research-base that links the standard identified causally as having impact on the development of the entry level professional competencies and learning outcomes at graduation.

Several of the following suggestions canvass different ideas on the ways in which improvements might be achieved.

7.3.1 Reducing duplication

The following suggestions were raised for improvements in relation to reducing duplication.

- Many higher education providers address this by attempting to dovetail internal course review processes with external accreditation processes such that the internal review deals with matters in consideration of the accreditation report or at the least common documentation is used for both processes or review panels may even be common.
- Higher education providers could assist by removing, or limiting, internal reporting requirements on programs which undertake accreditation. Currently, programs can be required to undergo quality assurance processes both internally and externally. This could be streamlined to ensure one process satisfies the other. It is important for professional accreditation bodies to consider the discipline/industry-specific factors that are not already achieved by meeting existing quality measures (e.g. AQF, TEQSA, global accreditation bodies) and tailor accreditation processes to these areas.
- Some accreditation processes require significant information about the university (or institution) and its policies and procedures. A defined package of information that can be acceptable across a large number of accrediting bodies would reduce duplication. Administrative burden could potentially be reduced if accrediting agencies were able to access relevant institutional data submitted for other regulatory requirements.
- Evidence and documentation requirements for individual accreditation processes could be streamlined and made less onerous and better alignment of requirements between accrediting bodies, including accreditation periods would ease the administrative burden and allow more flexibility in course design and delivery by removing overlapping and sometimes contradictory input-based requirements. Examples were also given of requirements by some professions (eg Pharmacy) to provide annual data on relatively unchanging items such as staffing, student numbers and placement hours, all of which is then required again in the 6 year application for re-accreditation.
- External requirements including professional accreditation in some cases align with the university's internal review and quality improvement processes, but require a much greater level of detail. Internal reviews are aligned closely to the HESF. If the professional bodies were to recognise the standards and requirements on higher education providers in relation to TEQSA and the HESF (and vice versa) this would allow for closer alignment and better consistency between accrediting bodies and between the accrediting bodies and the university.
- Professional accreditation in its most rigorous forms compares well to 'comprehensive course review' as prescribed in the HE Standards. It may be useful to have TEQSA examine the accreditation requirements of such bodies and where they are significantly robust, the two parties could sign an agreement such that, where a professional body accredits the course of an institution, TEQSA

recognises this as a formal part of the QA system of the institution and acknowledges it as part of its re-registration process.

- Professional agency MOUs with TEQSA – While MOUs with TEQSA are welcomed and seen as an improvement for reducing the regulatory burden some potential risks and implications for the roles of both organisations were also identified. It was suggested that these points need to be clarified and debated as do practices such as quarterly meetings with TEQSA that involve sharing hot issues and risk-based information.
- The key issue to streamline processes would be to ensure that professional standards could be encompassed in university and TEQSA evaluations so that staff preparing significant documents for professional accreditation would not require duplication for the additional quality reviews. Professional accreditations would always be more extensive but if key outcomes were mandated by TEQSA, these could be included in accreditation documents and reproduced and updated for university and TEQSA processes.
- Increased mutual recognition and more focussed submission templates and guidelines would ease the burden on institutions.
- Mutual recognition of online and on campus programs could be considered to avoid duplication of content where mode of delivery is the only difference.
- A standardised approach could be developed for providing generic information required by accreditation and regulatory agencies (e.g. organisational structure, policy frameworks, student support services, and mechanisms to manage educational quality assurance), such that educational institutions are able to re-use generic information for all accreditation and regulatory submissions and potentially save a significant amount of time and effort.
- The process of data documentation could be improved if universities could provide password access to relevant systems and databases as appropriate to the accreditation. Alternatively, if funding was available to develop national databases where information can be used for both internal and external purposes (for example, staff credentials), this might reduce preparation time and make it easier to retrieve/collate information.
- Multiple accrediting bodies within a single industry or profession could work cooperatively to accredit providers, or at least to align their accreditation requirements and processes to deliver a more efficient process.

7.3.2 Improving accreditation practice

The following suggestions were raised for improvements in relation to accreditation practice.

- Focus on professional competencies and learning outcomes at entry level to the profession. It was noted that some assessors' expectations exceed this baseline and expect entry level graduates to possess skills that require professional experience.
- Address the challenge of identifying what counts as evidence in outcomes-based assessment, noting the need for shared guidelines and principles.

- Limit the focus of accreditation processes on resourcing, course content and modes of delivery to only that which may be required to ensure graduates acquire the necessary knowledge and skills to be competent entry level practitioners. For example one incident was cited in which the accreditation panel spent considerable time investigating the way the university managed depreciation of its assets – a variable that is not conceivably related to education standards and practices.
- Clearly define the scope and activities of accreditation panels. Exceeding appropriate scope is a common complaint, for example one panel recommending that outside entities where students undertake placements should change their operations and build new infrastructure.
- Develop more efficient ways to train assessors – online, collaborative inter-professional, inter-agency training.
- Develop processes for moderation of the views of individuals through the team. Accreditation authorities should ensure that staff attending reviews and team members are capable of responding appropriately should any one member extend the scope of the accreditation assessment or behave unprofessionally.
- Consider the composition of review panels more carefully – it was noted that some who hold senior positions on accreditation panels may still be relatively junior academics while those overseeing courses are senior academics.
- Move in the direction of risk-based accreditation processes where a baseline is established and routine data monitoring or other evidence or significant change triggers a full review, rather than full reviews at set intervals. A number of independent accrediting agencies as well as a number of members of the Health Professions Accreditation Councils' Forum are exploring or implementing measures to enhance their monitoring of high risk providers and programs and to streamline process for low risk providers and programs.
- Promote quality improvement and reward providers by recognizing excellence through awards and showcasing.
- Consider the implications of micro-credentialing and similar trends.
- Improve the approach to assessing programs that are offered through methods such as online, mixed mode or disaggregated delivery, which continues to cause difficulties for many accrediting agencies.
- Clarify the limits of policy intervention e.g. skilled migration requirements have reportedly been used to force retrofitting of degree programs in some areas.
- In rapidly evolving professions clarify how the skills requirements are defined and by whom – the profession, the academy? Views vary between professions. Most adopt a collaborative consultative approach.
- Reduce lead time for accreditation so as to recognize and assist with the difficulties of marketing new programs to students.
- Develop transparent policies and procedures to avoid conflicts of interest in professional accreditation – real or perceived and where unavoidable employ mitigation strategies.

- Ensure a transparent review and appeal process through which parties to the accreditation process can request a reconsideration of judgements where they believe they have been treated unfairly through the process. (While most accrediting agencies have appeals and conflict of interest policies and processes a significant few do not, which is an untenable situation).
- Extend the principles and guidelines developed and agreed by national boards, accreditation authorities and AHPRA for the National Registration and Accreditation Scheme to all health professions.
- Accreditation bodies should maintain advisory committees that comprise members drawn from educational institutions as well as industry, to ensure that the accreditation standards set reflect the needs of the profession, are realistic for educational institutions to achieve, and encourage forward-thinking so that accreditation processes can be designed to meet the needs of future professionals as opposed to past professionals.
- Develop mechanisms for all accreditation to be able to be submitted online similar to the TEQSA portal.
- For some disciplines in the arts and humanities it has been suggested that a more efficient accreditation approach would be to ask institutions to conduct an audit and review around key priority areas and report on those.
- Establish feedback on the accreditation process from providers as standard practice. Ideally feedback from accreditation panels at the time of their visit would consist of a verbal report highlighting the Standards that have been met and mentioning those that may be problematic. This increases transparency. An example of good practice is that exhibited by the Australian Medical Council (AMC), where the Chair of the accreditation panel provides a verbal report summarising the strengths and weaknesses of the institution's submission at the end of the accreditation visit.

7.3.3 Enhancing Communication

The following suggestions were raised for improvements in relation to enhancing communication between the parties.

- Clarify the distinctive perspectives of TEQSA and professional bodies and promote the synergy. TEQSA is focused on the quality of the student experience and the governance of the institution while professional bodies are focused on the discipline, public safety and industry matters in which they provide expert advice.
- Publicise innovation and good practice.
- Improve engagement of the public in the formulation of standards and find better ways to communicate and develop a public narrative around the profession and "close the gap of trust".

7.3.4 Supporting innovation proactively through accreditation

The following suggestions were raised for improvements in relation to supporting appropriate innovation through the accreditation process.

- Support the evolution of educational programs to take advantage of new learning approaches and evolving professional roles.
- Support new practical training (e.g. work placement) capacity in non-traditional sites and new formats.
- Encourage models for cross-disciplinary and inter-professional supervision, and encourage access to new and different training sites.
- Encourage better coordination among accrediting bodies who are all involved in accrediting a single inter-disciplinary degree such as 'mental health' (which involves three different professions).
- Encourage active measures and support for innovative cross-discipline or other reform within the professions regulated within the NRAS. This is currently relatively absent in spite of it being a NRAS objective. There is variable attention to adoption of inter-professional education or simulation-based learning, with many professional standards (under NRAS or self-regulating) silent on these areas. The impacts include:
    - limited or no provision for students to be supervised by a clinician from a different profession to their own in some disciplines;
    - failure to take into account that modern healthcare is patient-focused and more often delivered by inter-professional teams in settings other than hospitals (e.g. Health in the Home and primary healthcare focus);
    - constraints on clinical placements in multi-disciplinary team contexts because there is not a full time clinical supervisor in the student's discipline.
- Standards should evolve to allow innovation in clinical education for example, to address such questions as:
    - Where can new practical training (e.g., work placement) capacity be found in non-traditional sites and new formats?
    - Where can we safely allow cross-disciplinary and inter-professional supervision models, and encourage access to new and different training sites, rather than continuing to overload existing placement providers?
    - How can we better use the practical training requirements available to help to address workforce maldistribution, getting students to learn where we hope they will work once they graduate? For example, developing clinical training opportunities in rural and regional areas, in schools, and in sectors of the workforce where there is growing need and emerging workforce shortages such as aged and disability care.
- Professional bodies should require members of the profession to assist in finding placements and mentoring students in a broader range of practice environments.

7.3.5 Benchmarking

Benchmarking or external referencing is a core component of the Higher Education Standards Framework and is necessary at several levels. All higher education providers engage in benchmarking processes which are steadily gaining in sophistication.

Accreditation Councils can also provide leadership and support for developing benchmarking approaches, and increased use of data driven monitoring reports for ongoing accreditation will assist the evolution of benchmarking. External benchmarking of assessment and external referencing is a "natural fit" with professional accreditation. Some respondents predicted a gradual shift towards harmonisation of provider and accreditor developed benchmarking processes. Some examples of current practices initiated by accrediting agencies are listed below:

- The Australian Dental Council is trialing a voluntary student examination at the beginning of fifth year which feeds back to each participant provider their students' performance compared with other de-identified providers. At the moment this is conducted on a voluntary basis at no cost to the providers. Feedback can also be provided on the performance of individual students and specific areas of the curriculum.
- The Pharmacy Council has a compulsory assessment of all graduates at the end of their internship year post graduation. Data from this assessment is fed back to providers and assists with benchmarking.
- The Australian Institute of Quantity Surveyors (AIQS) has added a dimension of external examination to its annual monitoring reports for ongoing accreditation. Two external examiners visit the institution, interview students and review samples of assignments and examinations annually. A negative report from the external examiners could trigger a re-accreditation process. The external examiners are usually one academic and one local practitioner.
- CPA requires samples of assessment as part of the re-accreditation process that also provides an opportunity to compare standards between providers.

7.3.6 MOUs with TEQSA

A number of agencies have MOUs with TEQSA and several others are seeking them. Implementation takes a different form depending on the agency and the nature of the needs. TEQSA itself is keen to be selective in its entry into MOUs so as to ensure that those they have are productive and active and represent a large portion of the student body. There is willingness on both sides to allow relationships to develop according to need in an organic fashion. At the moment the main features of MOU partnerships are ease of communication, sharing information on accreditation timetables and 'hot issues' as they arise. For example, one agency takes a "more forensic approach with providers who have either received conditional accreditation and/or less than seven year reaccreditation cycle from TEQSA." This has been facilitated by the existence of the MOU with TEQSA. The ability to be proactive in the relationship is valuable.

Both the accrediting agencies and TEQSA see a strong opportunity to share a common quantitative dataset for assessing risk. Harmonising and/or coordinating processes and timetables and sharing expert reviewers are other positive opportunities. Some accrediting agencies and professions are too small to warrant a formal MOU relationship with TEQSA but recognise the benefits of streamlined interaction. In some cases where jurisdiction-based registration still occurs the relationship is more complex in that, for example, TEQSA has a relationship with AITSL and has recently signed an MOU with at

least one state regulator with others to follow but not yet with each of the jurisdictions (although a couple have used TEQSA reports in their accreditation process). In some professions different jurisdictions may also be reluctant to "trust" TEQSA processes to ensure that some standards are met, thus creating a duplication problem for providers with the same information being required in several different formats (for internal QA, for TEQSA and for the registration authority).

Some have suggested that the simplest and most achievable streamlining is for TEQSA to recognise external accreditation as satisfaction of the relevant Higher Education Standards. It has also been noted, however that TEQSA and accrediting agencies have different needs, particularly in some disciplines so that their interests, criteria and needs do not always align completely. In some disciplines such as clinical areas information gathered by TEQSA for its purposes may not be sufficient for professional purposes.

Various respondents suggested that the most profitable ways forward for TEQSA and its relationships with most accrediting bodies are through:

- collaboration with or common criteria for data-based risk assessment;
- attempts to align cycles to permit better coordination of reviews
- sharing registers of experts and their preparation; and
- ensuring that accreditation is aligned with the HESF.

Although attempts to align review cycles between TEQSA and accreditation agencies or between agencies appear to be superficially attractive there is not a great deal of support for movement in that direction. The Health Professions Accreditation Councils' Forum reports approaching providers concerning the possibility of aligning accreditation timetables between professions but the institutions approached did not support the suggestion. It could actually have the effect of increasing the burden. Reducing diverse demands for the same information or sharing information would, however, be welcome.

In the interests of more efficient information sharing it would be worth considering a system where, with the permission of the institution involved, a specified accreditation body could be given access to data already collected by TEQSA. This arrangement could be less comprehensive than an MOU but could be available to approved accreditation agencies.

8 CONCLUSIONS

8.1 ADVICE ON BENEFITS AND CHALLENGES

Effective, efficient and transparent accreditation enjoys virtually universal support because of its numerous benefits. There is also evidence of an impressive level of bilateral commitment and goodwill underlying the process of accreditation. Almost all professional groups develop standards through a process of extensive consultation with professionals, industry and academia thus ensuring ongoing relevance to professional practice, community needs and educational innovation. Teams of assessors that include members from academia, industry, the community (and in a few cases students), provide a very useful mechanism for bringing industry knowledge to university teaching practices.

Accreditation processes are, however, generally labour intensive and expensive. Despite comprehensive documentation aimed at dispelling ambiguity, a frequent criticism is that there is too much scope for individual and idiosyncratic interpretation. Lack of clarity around standards may cause administrative delay and unnecessary resource expenditure.

The benefits and challenges of accreditation are outlined in detail in preceding sections of this report. A few conclusions deserve to be highlighted.

- There is a general convergence towards accreditation standards and processes that are aligned with the Higher Education Standards Framework, that address the UA/PA good practice principles, and that have the capacity to complement TEQSA processes. There is, however considerable scope for a better definition and understanding of the issues that TEQSA must address and those that must be addressed by professional bodies. There is also considerable scope for new arrangements where, with the permission of the provider institution information already gathered by TEQSA for its regulatory purposes could be shared with professional accreditation agencies.

- Outcomes-based accreditation assumes a risk-based approach but it is rarely articulated as such, and an opportunity exists for sharing the principles of accreditation risk management and (as suggested above) information bearing on risk, amongst accreditation agencies and TEQSA. In the longer term this might expand to better alignment with other TEQSA processes.

- There is also a significant gap in many professions between the intent of the criteria and processes for accreditation and their translation in practice. This appears to be due to the dynamics surrounding an extensive and complex process that is undergoing significant change. While organisations may know what they want to achieve it is clear that individual members of those organisations are not always fully aware of the context or objectives.

- There is a growing interest in mechanisms for sharing, for example various types of course performance data, opportunities for training assessors, common templates, datasets and online portals. There is a particular interest in collaborating to refine methods for differentiating the risk ratings of various providers to allow "right touch" accreditation.

- Sharing and collaborative development between isolated and independent professional organisations rarely occurs in the absence of some mutually recognised need or visionary leadership. One of the weaknesses of the existing landscape of accreditation is that there are 80 – 100 (and the number is growing) essentially independent accreditation bodies each developing their own processes, standards, criteria, formats, templates etc. This generates an inefficient use of accreditors' resources as well as creating an onerous and extremely expensive burden for education providers who, in any one year, may be responding to the requirements of 30 or 40 agencies. For academic units that comprise multiple health sciences schools for example the direct and indirect costs risk becoming prohibitive. There is also evidence that consideration of the costs of re-accreditation constrains curriculum innovation.

- The beginnings of a leadership capacity to increase the level of collaboration or shared principles and tools are evident in the Universities Australia/Professions Australia Joint Working Party and the Health Professions Accreditation Councils' Forum. However, taken together these two groups cover fewer than half of the accrediting bodies. The remainder are self-regulating and independent bodies without easy access to support, advice or shared resources or indeed the perceived need for them. This is not to say that independence is undesirable but that it can lead to isolation which impacts adversely on both accreditors and providers. There is a large number of small unregulated professions who do not have the membership base required to support financially more efficient approaches such as online submissions, regular benchmarking of processes and standards, training of assessors, research to provide an evidence base for standards and various aspects of due process.

- For most professions there is also no body that has the authority to mediate when agreement between accrediting agency and provider cannot be reached. In such intractable cases the provider usually decides to vacate the field to the ultimate disadvantage of its students. It is significant that an issue as far-reaching as the ability of a registered higher education provider to provide access to education in the professions may not be subject to any administrative appeal or independent mediation. It is not suggested that mediation or appeals processes should address the professional standards themselves but that they should address the due processes involved in applying those standards to the accreditation decision. A simple example of this provided by one university is the inability to appeal the imposition of two sets of accreditation fees for essentially the same course with the only difference being semester 1 or 2 student intake. Even the National Registration and Accreditation Scheme for registered health professions

administered by AHPRA in partnership with National Boards does not include a statutory mediation or appeals process.

8.2 ADVICE ON OPTIONS TO REDUCE REGULATORY BURDEN AND FOSTER INNOVATION

The following advice has been compiled from submissions received from providers and accreditors. The common thread linking all advice is the need to establish mechanisms to build bridges between agencies and to reduce "accreditation in isolation".

8.2.1 Defining accountability standards for accreditation agencies

In North America accrediting bodies are reviewed on a regular cycle by the US Department of Education. A regulatory process such as this is not desired in Australia and would be counter to the intention to reduce "red tape" in higher education regulation. There is, however, significant scope for broad-based consultation and official recognition of the UA/PA Joint Working Party's proposals as an "Accreditation Best Practice Benchmark" or blue-print which all agencies could be encouraged to use as a reference point. Such a benchmark could also be used as a standard for mediation of disputes by some type of oversighting group, committee or ombud's office (perhaps an expansion of TEQSA's role in this regard could be considered or a mediation committee of UA/PA). The options for improvement summarised in Chapter 7 provide a comprehensive checklist for development of good practice guidelines for accreditation.

Related to accountability is the absence of oversight of decisions to establish accreditation agencies - some respondents pointed to an increasing prevalence of external accreditation beyond traditional professional programs and a proliferation of several bodies accrediting the same discipline.

There is no process whereby discipline areas or professional associations have to justify their decisions to self-organise and commence accreditation. It is possible that these decisions are at least to some extent influenced by territorial ambition rather than public safety. Since some professional associations are responsible for both accreditation and building their membership base or protecting their members' market position it would seem reasonable to establish governance criteria for accreditation agencies which firewalls accreditation decisions from other aspects of corporate decision making.

Accountability mechanisms could also be considered to encourage multiple bodies who are operating within one professional area to agree on one national set of degree accreditation standards and processes to minimise the burden on providers.

Other issues of accountability that were raised do not seem at this time to have any avenues for resolution other than the practice of good administration and governance by agencies which could be encouraged by a code of practice or good practice benchmark. While these incidents are in the minority they are quite critical to providers. For example one cited a recent experience of submitting a response to an accreditation report in June 2015 and not receiving a reply until May 2016 despite several follow-ups. This delay had

flow on effects for internal course review processes that were delayed awaiting feedback. Such extreme cases are relatively rarely reported but other poor practices more frequently cited include: antagonistic site visit panels; mismatches between verbal & written comments and resulting requirements; accreditation contacts failing to respond to email requests for information; excessive amounts of evidence being required; unrealistic deadlines for responses and apparent lack of transparency around the decision making of accrediting bodies. Providers have no recourse to address these issues.

OPTION FOR IMPROVING ACCOUNTABILITY

A nationally agreed protocol for good practice principles and practices for accreditation could be established through wide consultation and promulgated as an "ideal model" for all accreditation agencies. The work already commenced by Universities Australia and Professions Australia should form the basis of this approach. This national "ideal model" could be used as a reference point for mediation of intractable disputes over process by a designated body – perhaps TEQSA's remit could be extended to allow a role in mediating such disputes.

Regular surveys of accreditation practice could monitor progress and assist with continuous improvement.

8.2.2 Defining and consolidating common data needs and formats

Several respondents pointed to the need to work towards consistency of definitions for key terms and data cycles amongst accrediting bodies and higher education institutions. Some commonly-used terms, like 'retention', for example, are ascribed different meanings by professional accreditation bodies, TEQSA and HESF and universities themselves. There is no consistency in the way academics are classified and counted e.g. adjuncts, placement supervisors, contractors. These distinctions are important when assessing various indicators of both inputs and outcomes. Definitions guide the way accreditation data are collected. Without consistency of definitions a mismatch between the data produced by a provider and the data sought by accreditors is likely.

One provider noted that: "Each accrediting body has its own requirements for an application thus making each accreditation submission an individual exercise. The requirement for each submission to include the most recent student, staff and curriculum data, results in the university having a limited ability to reuse information across different accreditation submissions…The extremely manual nature of the process that involves printing and sending documents, collating materials etc., make the process additionally time-consuming and costly. It would certainly be preferable if the process was moved online. It would also be good if there was a generic section / information that was acceptable to all accrediting bodies (e.g. institution name, purpose, address, QA process etc). "

OPTION FOR IMPROVING CONSISTENCY

A "Plain English" simple guide, (perhaps in the form of a table) could be developed, with broad consultation, to differentiate TEQSA's regulatory criteria for registration of providers from course accreditation criteria that are properly the concerns of accreditation agencies. It might also be useful to include a third column for those criteria that are institutional rather than professional concerns. The suggested Good Practice national protocol could clarify these respective information requirements and the desirability of avoiding duplication.

A mechanism could be considered to enable accreditation agencies to access regulatory and governance information already collected by TEQSA, with the provider's approval, thus eliminating the necessity to provide the same information in different formats.

As part of this "Plain English " guide common terminology could be defined so that terms defining critical data requirements (eg retention, categories of staff) are consistent and the format in which they are provided can be consistent. This could extend to better definition of the process for risk assessment and sharing of approaches between TEQSA and accrediting agencies.

Benefits would also be realised by a concerted attempt to map at a broad level the extent of overlap between the Higher Education Standards Framework and professional accreditation standards. The objective of such mapping would be to reassure professional accreditation bodies that input and process issues at an institutional level are accredited by TEQSA, thus freeing up professional accreditation to concentrate on the processes and inputs that are necessary to produce specified professional outcomes. For example, some accrediting bodies concern themselves with university governance, facilities management, general student support, academic quality assurance and assessment integrity – all issues which are critical to TEQSA's decision to register a provider. Other accrediting agencies take the approach that since a provider is registered by TEQSA such issues can be assumed to be up to the required standards.

8.2.3 Developing and sharing accreditation philosophy, resources and expertise among regulators and accreditors.

Regular briefings and forums such as those held by TEQSA in the run-up to implementation of the revised HESF are an important opportunity to ensure that professional accreditation bodies are apprised of current national and international priorities and approaches to accreditation. Such events should share exemplars and stress the benefits of accreditation for assisting flexibility, innovation, benchmarking, future-proofing and continuous self-assessment and quality improvement. While the need for compliance with established criteria will continue to be important its relative

place in the scheme of things needs to be continually re-assessed and discussed in the context of broader objectives such as continuous quality improvement and innovation.

It is obviously difficult for smaller professions or those with a limited resource base to develop the training and support infrastructure that is necessary to ensure that all assessors who are involved in the accreditation process are equally informed about higher education policy and trends as well as appropriate interpretation of standards and evidence. Some respondents have pointed out that accrediting bodies that lack this critical mass may also have difficulties in maintaining the academic standing and capacity to provide advice on best professional practice to providers – this aspect may need to be addressed in best practice guidelines for accreditors. There is considerable scope for shared approaches to training and for greater interaction of assessors across disciplinary boundaries. Formulation of clear national standards for best practice in accreditation could encourage these developments. UA and PA could extend their engagement in establishing good practice frameworks to more far reaching consultation and discussion forums. One accrediting agency suggested that there would be benefit in a regular analysis and benchmarking report on national and international professional accreditation practices, costs and benefits in order to identify best practice across multiple sectors as each profession tends to operate in isolation and have limited opportunity to share these results with other professions. There is also a need to encourage benchmarking and international recognition for Australian accreditation agencies.

Currently a limiting factor that hinders greater sharing is funding. Each accrediting body is reliant principally on funding from its members by way of registration or membership fees. Diversion of these funds to shared or interdisciplinary activities might not be seen as defensible or a high priority.

OPTION FOR IMPROVED SHARING OF RESOURCES

There is scope for collaboration in briefing agencies on modern trends in regulation and accreditation, for training and/or sharing of reviewers or assessors even across disciplines, and in issuing regular briefings on national and international practices, costs and benefits. However it is not clear who should or could accept a lead role in coordinating this collaboration.

Memoranda of Understanding with TEQSA permit sharing of findings and risk ratings of providers between TEQSA and specified accrediting agencies. However, MOUs with all accrediting agencies are probably not feasible. A more limited standard information sharing agreement, involving permission from the institution undergoing accreditation, could be investigated to allow approved accrediting agencies to access specified TEQSA data sets and risk assessments.

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OPTION FOR IMPROVING EFFICIENCY

Efficiencies could be achieved if an online tool could be developed and made available for use by all accrediting agencies at low or no cost. An online accreditation application tool (similar to the one used by TEQSA) could allow common institutional and academic data to be entered according to a standard format with standard fields of information such as participation and performance statistics in the relevant course. Open fields could then be populated with requests for information inserted by each accreditation agency according to its own criteria. Each agency could license and manage the online tool software but it would be a shared format making it easier for providers to submit their data and core information in a common format each time. Such a development, would however require considerable consultation, a central coordination exercise and probably dedicated establishment funding. While ongoing maintenance could be funded by a licence fee this would likely discourage its use by smaller agencies. Several agencies already have already developed or are developing their own online tools.

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PROFESSIONAL ACCREDITATION

Part 2 Appendices

FINAL REPORT

February 2017

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APPENDIX 1 OVERVIEW OF ACCREDITATION AGENCIES & PROFESSIONAL BODIES

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
EDUCATION						
Australian Institute of Teaching and Student Learning AITSL www.aitsl.edu.au CEO Ms Lisa Rodgers Melbourne AITSL Corporate Office 03 9944 1200 info@aitsl.edu.au	State and territory departments of education are responsible for the accreditation of teacher education programs through jurisdictional teacher regulatory authorities. The authorities lead and implement *National Program Standards and Procedures* in collaboration with AITSL. The *Program Standards* are designed to ensure that all graduates of initial teacher education meet the *Australian Professional Standards for Teachers* developed by AITSL. The approach to accrediting initial teacher education is based on an assessment of their impact requiring evidence of pre-service teacher performance during the program; and evidence of the achievement of a program's graduates following completion, including their impact on student learning in schools.	State Authorities	No	Yes		5 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Australian Children's Education and Care Quality Authority (ACECQA)	The National Quality Framework (NQF) sets out minimum qualification requirements for educators working in children's education and care services. ACECQA has responsibility under the Education and Care Services National Law Act 2010 for determining if qualifications are equivalent to the approved early childhood education qualifications under the NQF. It determines and publishes lists of approved qualifications for three types of early childhood educators under the National Quality Framework (NQF): Early childhood teacher; Diploma level educator; Certificate III level educator. Teacher registration requirements also apply in jurisdictions, for example, from 18 July 2016, all NSW early childhood teachers working in long day care and preschools must be accredited by the Board of Studies, Teaching and Educational Standards (BOSTES). Higher education providers and organisations need to apply to ACECQA if: they want their course or program added to an approved list of qualifications; or if they are making significant changes to the structure or content of a course that is already on the approved list.	State Authorities	No	Yes	$2168	5 years
Australian College of Educators www.austcolled.com.au			Several categories of individual and corporate	No		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
			membership			
LAW						
Law Admissions Consultative Council (LACC) Legal Profession Admission Board LPAB in each jurisdiction. Sandford Clark, Chairman LACC sandford.clark@ashurst.com	www.lawcouncil.asn.au/LACC LACC is a Council of representatives from each jurisdiction and has developed a common framework for accreditation which is coordinating rather than binding to keep all formal rules compatible. Considerable variation in practice remains. Guidelines setting out Practical Legal training (PLT) competency standards and model admissions rules are accepted by all jurisdictions. Graduates from all accredited law schools are recognised by all Australian jurisdictions as satisfying the academic requirements for admission. Victoria and NSW have formed a National Admissions Board for admission to practice but other jurisdictions remain independent. Council of Australian Law Deans (CALD) has developed a set of national standards against which law schools are judged by an independent and eminent panel (the CALD Standards). This assessment has been carried out for the first time in 2015-16. It is a voluntary process, although a large percentage of law	No		Jurisdiction based admission to practice		Proposing 5 yearly.

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	schools participated. Some local admissions bodies pay attention to the CALD Standards when they consider accreditation of law schools but as voluntary guidelines the Standards are not themselves forms of accreditation and do not have a practical impact except insofar as they encourage law schools to maintain minimum acceptable standards.					
SOCIAL WORK & HUMANITIES						
Australian Association of Social Work www.aasw.asn.au	Accreditation Standards revised 2015 (ASWEAS). Standards are comprehensive covering entry standards, grad attributes, LOs, core curriculum content, placements, RPL, governance and organisational arrangements, reaccreditation and new programs. Specify minimum staff of 5, 50% with SW qualifications. Standards currently under review – to bring them more into line with modern approach – more outcomes focused. Also accreditation model.	No	Membership of AASW	Yes	$15,000 for one program at 1 site.	Review every five years with annual reporting.
Australian Community Workers Association www.acwa.org.au	Standards duplicate many TEQSA criteria for course accreditation and/or registration. Prescriptive wrt class sizes, fieldwork placement conditions and staffing. Conduct regular compliance audits of accredited programs and may render	No	Yes	Yes	Annual fee	Requires annual course registration to retain

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	provisional, suspend or revoke accreditation at any point.					accredited status
National Accreditation Authority for Translators and Interpreters NAATI www.naati.com.au	Standards require course and unit description and assessment details	No	Graduates are accredited by NAATI	No	$139	
Public Relations Institute of Australia PRIA www.pria.com.au	National Education Committee carries out accreditation based on standard application form emphasising outcomes and methods. Criteria set out in professional standards document. Expectation that coordinator will have a degree if it is university based program but not necessarily in non-self-accrediting HEP.	No		Yes		Annual renewal
Australian Market and Social Research Society AMSRS www.amsrs.com.au		No	Individual	No		
ENGINEERING						

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Institution of Chemical Engineers www.icheme.org	UK based customerservices@icheme.org; austmembers@icheme.org; 0396424494 http://www.getchartered.org/knowledge-and-understanding/further-learning.aspx International accreditation IChemE is active in developing and raising standards in chemical engineering education and training worldwide, through its accreditation program. Accreditation of an academic program involves the detailed assessment of learning outcomes against its high, internationally recognised standards.	No	Awards Chartered Chemical Engineer & Professional Process Safety Engineer	Yes Yes		
Engineers Australia www.engineersaustralia.org.au	https://www.engineersaustralia.org.au/sites/default/files/160127_web_listing_-_combined_v12_updated_27_january_2016.pdf Engineering schools typically offer up to 10 distinct accredited 4 year programs with some moving to entry level Masters degrees that qualify graduates to commence supervised practice as professional engineers. Soe also offer Bachelors of Engineering technology degrees also accredited by EA.	National Engineering Register		Yes		5 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	Complicated, multiple specialty colleges. Assessment of any particular academic program for accreditation is based on the following criteria: • the teaching and learning environment; • the structure and content of the program; and • the quality assurance framework. A generic framework for developing specific education outcomes for programs is provided in the generic attributes requirement of the Engineers Australia Accreditation Policy, and more specifically in the Stage 1 Competency Standards. The generic attributes recognise the broad nature of professional engineering practice in today's world. The accreditation process does not prescribe detailed program objectives or content, but requires engineering education providers to have in place their own mechanisms for validating outcomes and continually improving quality. Accreditation does, however, judge the appropriateness of educational objectives and targeted graduate capabilities, the integrity of the educational design and review processes and the means employed to deliver and monitor outcomes. Currently undertaking periodic revision of accreditation					

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	criteria and process and are aware of need to align with HESF.					
1) Australia is a signatory to the Washington Accord which is an international agreement between countries to mutually recognise accredited engineering qualifications from the countries that are signatory members to the Washington Accord. Seventeen countries and regions have signed the Washington Accord which allows reciprocal membership between engineering associations in all 17 countries and regions. 2) Engineers Australia is the authority for assessing engineering qualifications and experience of an overseas applicant to stay in Australia and work as an engineer. Generally, if the applicant has completed an Australian Bachelor of Engineering degree offered by an Australian university and completed at least 2 years of a 4 year bachelor degree in Australia or completed a Bachelor of Engineering degree offered by an Australian university in an offshore location which has been specifically accredited by Engineers Australia then eligibility for professional memberships of Engineers Australia is automatic. Holders of postgraduate degrees in engineering that are not automatically accredited by Engineers Australia are required to have their qualifications individually assessed by Engineers Australia in order to obtain membership. 3) Two Australian schools have separate accreditation from European Network for Accreditation of Engineering Education (ENAEE)						
SCIENCE						
Australian Veterinary Boards Council AVBC admin@avbc.asn.au	Veterinary Schools Accreditation Advisory Committee	Legislation is in process to allow national registration		Yes	Cost recovery for site visits	Up to 7 years
Australian Institute of Physics www.Aip.org.au Accreditation Manager	http://www.aip.org.au/info/sites/default/files/AIPAccreditationRegs2012updatedAug121.pdf Accreditation involves three members of accreditation committee.	No	Includes student members, support available for conference	Yes	$4,400 within Australia incl all costs for site visit	

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
aip@aip.org.au	Standard process, emphasis on inputs as well as competencies		attendance			
Royal Australian Chemical Institute RACI www.raci.org.au	New Guidelines not yet available Revised outcomes based accreditation process operating since 2015	No	Yes	Yes		4 years
Australian Biotechnology Organisation www.ausbiotech.org		No		No		
Australian Institute of Agricultural Science & Technology AIAST www.aiast.com.au		No		No		
Australian Institute of Food science and Technology AIFST www.aginstitute.com.au	Produces Australian Agricultural College Corporation Course Guide	No	Individual members Continuing education	No		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
			only.			
Australian Mathematical Society AustMS www.austms.org.au		No	Individual members	No		
Australian Society for Biochemistry & Molecular Biology ASBMB www.asbmb.org.au		No	Individual members	No		
Australian Society for Microbiology ASM www.theasm.org.au	Accredits individuals only through National Examinations and Qualifications Board which assesses the qualifications of applicants for professional membership and for Fellowship	No	Individual members	No		
Statistical Society of Australia SSAI www.statsoc.org.au	http://www.statsoc.org.au/careers-accreditation/professional-accreditation/accredited-courses/ Outlines minimum study volume in degree and content that should be covered, staff and qualifications. Assessed by accreditation committee, approved by Executive and Certificate of Accreditation provided. Graduate of accredited	No	Yes Accredits individuals for accredited statistician or gradate	Yes	$700	

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	course has automatic admission as Graduate Member – Only 5 Australian universities have availed themselves of this		statistician status			
Australian Institute of Mining and metallurgy www.AusIMM.com.au		No	Accredits individuals for Chartered Professional status	No		
Australasian College of Physical Scientists and Engineers in Medicine ACPSEM www.acpsem.org.au	https://www.acpsem.org.au/documents/item/37 Accredits PG courses in medical physics and clinical health services offering medical physics or radiopharmaceutical science. Must complete PG course accredited by ACPSEM before able to enter Training Education and Assessment Program (TEAP). Provides suggested core syllabus and detailed content.	No		Yes	Lodgement fee $550; Annual fee $800	
Institute of Australian Geographers www.iag.edu.au		No	Individual members only	No		
Civil Aviation Authority	Operates under its own regulations.	No	No	No		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
www.casa.gov.au						
Safety Institute of Australia https://sia.org.au		No	Individual	No		
ARCHITECTURE / BUILDING / DESIGN						
Australian Institute of Architects AIA The Institute is a co-owner of the ANZ Architecture Program Accreditation Procedure (ANZ APAP) with the AACA (see below). Architects Accreditation Council of Australia AACA	http://competencystandardforarchitects.aaca.org.au/about http://www.aaca.org.au/wp-content/uploads/2013/12/ANZ_APAP_Final_Dec_2013.pdf ANZAPAP maintains an overview of accreditation of courses which is done by state based architecture registration boards using the common National Standard of Competency for Architects (NSCA) criteria and processes. Registration requires graduation from an accredited program and successful completion of minimum period of practical experience, a national exam paper and an examination by interview. The Architectural Practice Exam (APE) is maintained by AACA. National Education Committee contact:	Practising architects must be registered with the Architects' Board in each jurisdiction	AIA has student and graduate member groups. SONA is national student membership body	Yes	Apportioned equally. Registration Boards, AIA & provider	Maximum 5 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	Nicolette.DiLernia@architecture.com.au www.architecture.com.au/educationpolicy APAP Steering Committee http://www.aaca.org.au/?s=course+accreditation					
Australian Institute of Landscape Architects AILA admin@aila.org.au www.Aila.org.au	National Education Committee National Accreditation Review team visits and reports to NEC. Heavy emphasis on inputs as well as curriculum content. Minimum requirement AQF level 8 of 4 years duration	No		Yes		
Planning Institute of Australia PIA www.planning.org.au	Revised consultation draft out now. Covers capabilities, competency and supporting knowledge as well as accreditation processes. Performance outcome focused. Also provides Visiting Board Guidelines. Completing accredited course allows use of MPIA. http://www.planning.org.au/documents/item/7497 also http://www.planning.org.au/documents/item/7034	No	Individual membership	Yes		Reviewed by Visiting Board process every 5 years
Australian Institute of Building AIB Education Manager	https://www.aib.org.au/wp-content/uploads/2014/10/AIB-Accreditation-General-Information.pdf Accreditation for Building and Construction degrees.	Aligned with National Building Professionals	Yes	Yes	Initial and annual	From 18 months to 5 years depending on

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
ceo@aib.org.au www.aib.org.au	Committed to collaboration and mutual recognition. Compliance with TEQSA's provider standards is accepted as demonstration of adequate institutional capacity. Completion of accredited course meets academic requirements for membership of AIB and national Licensing	Register and National Licensing				assessment
Australian Institute of Quantity Surveyors AIQS education@aiqs.com.au www.aiqs.com.au	Completion of accredited course meets academic requirements for membership of AIQS. Membership also to graduates of courses accredited in Malaysia, NZ, South Africa, Singapore, Hong Kong, Canada, Sri Lanka. Risk based approach after initial accreditation based on data supplied in annual reports and external examiners from accredited institutions.	No	Yes	Yes	No fee but cost recovery for site visits	Initial and then annual monitoring
Australian Institute of Building Surveyors www.aibs.com.au	No information on website	No	Accredits individuals	No		
Australian Property Institute API National manager - Education national@api.org.au	No information on website		Accepts graduates from accredited programs for	Yes		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
www.api.org.au			member-ship			
Project Management Institute (PMI) www.aipm.com.au courses@aipm.com.au	https://www.aipm.com.au/documents/aipm-key-documents/aipm_course_endorsement_guide_v11.aspx			Conducts course endorsement Does not endorse providers	Initial $1200, Annual fee $950, Total cost over 3 years $4050	Endorsement lasts 3 years with annual 'stat dec' saying no changes occurred.
Australian Institute of Project Management www.aipm.com.au/certification/	Assessors certify individuals for membership	No	Individual and corporate	No		
Design Institute of Australia DIA www.design.org.au	http://www.design.org.au/documents/item/56 Login protected Accreditation available only to DIA Education member Universities, HEPs and RTOs. At least AQF 6 or 7 level qualifications required.	No		Yes		
International						

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Royal Institution of Chartered Surveyors (RICS) www.rics.org	UK based http://www.rics.org/au/footer/media-centre/use-of-the-rics-logo/rics-education-establishment-accreditation-brand-descriptions/ Partnership universities in Australia combine with RICS to develop new and existing courses. Course accreditation relies on experienced RICS academics and employers assessing each university's programme to ensure there is both an appropriate curriculum and the resources in place to enable the delivery of the program to meet the high standards demanded by RICS. Every university is visited every few years by RICS auditors. The RICS external quality assurance system monitors the standards of graduates annually and each program is monitored annually through an annual report. The accreditation process is highly valued by universities. All courses are audited against standards preparing graduates for the Assessment of Professional Competence (APC).			Yes		
Chartered Institute of Building (CIOB) www.ciob.org	UK based No info on website Accredits foundation, undergraduate and postgraduate programmes in all countries that match educational			Yes		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	requirements					
Board of Quantity Surveyors Malaysia www.bqsm.gov.my	https://www.bqsm.gov.my/index.php/en/download/accreditation/category/accreditation-manual			Yes		
Pacific Association of Quantity Surveyors www.icoste.org	http://www.icoste.org/accreditation/certification/ Accredits CPD programs run by sister organisations in the Pacific.			CPD only		
Hong Kong Institute of Surveyors www.hkis.org.hk	http://www.hkis.org.hk/zh/pdf/degree/Policy_and_Procedures_for_Course_Approval_Maintenance_and_Review_99.pdf Accredits only at Honours or Masters level.		Accepts graduates for entry to professional competence in specific areas	Yes	Annual fee review	Maximum 5 years
Singapore Institute of Surveyor and Valuers www.sisv.org.sg	http://www.sisv.org.sg/Membership/BeASISVMem/EntryRoute/SISVAccreditedCourses_Procedures.pdf Seven Australian universities are accredited for specific years.		Yes	Yes	SDG2,000	Up to 5 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	Priority on re-accreditation of overseas courses.					
INFORMATION MANAGEMENT & INFORMATICS						
Australian Health Informatics Council www.ahiec.org.au	Competencies and career pathways document 2011 http://www.ahiec.org.au/docs/AHIEC_HI_Scope_Careers_and_Competencies_V1-9.pdf	No	No	No		
Australian Council for Computers in Education www.acce.edu.au		No	No	No		
Australian Computing Society www.acs.org.au	Core Body of Knowledge (CBOK) compliant with Seoul Accord https://www.acs.org.au/__data/assets/pdf_file/0013/24502/The-ACS-Core-Body-of-Knowledge-for-ICT-Professionals-CBOK.pdf Accredits software engineering courses alongside the EA accreditation process. Conducts Professional entry level accreditation AQF 7 & Advanced professional level AQF 9. Institutions: • Designate the main ICT job role(s) for graduates from their programs;	No		Yes	Initial $7,500, desk audit minor change, $850, extra site visits $2,500	Up to 5 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	• Justify the 3-5 key SFIA skills required to achieve the designated job role; and • Demonstrate how their program achieves the depth required for the 3-5 key SFIA skills.					
Institute of Analytics Professionals of Australia IAPA www.iapa.org.au	The role of the Institute is to promote the profession. Offers its own online courses. "Featured Partner" is Deakin University	No	Yes	No		
Australian Library and Information Association www.alia.org.au education@alia.org.au	Courses assessed against ALIA education policy statements. Gold level involves visit to institution. Guidelines and core knowledge documented. Collaborative process https://www.alia.org.au/employment-and-careers/education-courses-careers-libraries-and-information-management-sector/accreditation-process	No	Yes	Yes		Intervals of not more than 5 years
Records and Information Management Professionals Australasia www.rimpa.com.au	http://rimpa.com.au/professional-development/course-recognition/ Course appraisal is called a "recognition program" Provider self assesses the course against the Statement of Knowledge for Recordkeeping professionals and submits the application with evidence. Assessment may take 3 months and a site visit.	No	Yes	Yes		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Australian Society of Archivists ASA www.archivists.org.au office@archivists.org.au	Criteria based on ASARIMPA Statement of Knowledge and AS ISO 15489-2002 Records Management. Focus is on academic content not university facilities or mode of delivery. Does not replicate university quality assurance processes.	No	Yes	Yes		5 years Annual course return aligned with uni data.
BUSINESS						
Chartered Accountants ANZ CAANZ previously ICAA and NZICA https://chartered accountantsanz.com	List of 11 required competence areas such as 'business law', taxation, quant methods. we recognise graduates with a Bachelor degree or 12 unit accredited Masters degree in accounting/business/commerce or economics from a recognised Australian University. Those courses that satisfy academic requirements for entry to Chartered Accountants Program run by CAANZ are added to accredited courses list. Applicants for CAP self assess against the course they did.	No		Yes	No fees	
Institute of Public Accountants IPA Faculty EO Greg Tangey gregtangey@publicacco	Review based on curriculum teaching outcomes and whether it meets IPA's core requirements - also must be fully accredited /registered by TEQSA and CRICOS.	No	Yes	Yes	No fees	3-5 years review

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
untants.org www.publicaccountants.org.au	Graduates from accredited programs admitted to Associate Membership and given recognition of prior learning towards the IPA Masters program. Full membership of IPA only available to t hose who have done the IPA Graduate Certificate and Masters program which is offered in partnership with University of New England.					
CPA Australia accreditation@cpaaustralia.com.au	http://www.cpaaustralia.com.au/cpa-program/professional-accreditation-guidelines/section-2-accreditation-standards http://www.cpaaustralia.com.au/cpa-program/accreditation-guidelines-for-higher-education-programs Coordinates with CAANZ to accredit accounting programs in Australia. Detailed guidelines on eight standards. It is not the intention of the Professional Bodies to have providers write material especially for the submission. Instead, it is preferred and anticipated that much of this material already forms part of the providers' existing documentation and can be readily accessed and utilised for submission purposes. Any new school of accounting or new accounting program within an established school must not advertise an accounting program or give the impression that it will lead to a qualification which entitles graduates to enter the relevant professional program until such a program has been granted	No	Yes	Yes		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	accreditation approval by the Professional Bodies.					
Australian Human Resources Institute AHRI www.ahri.com.au	Tertiary Accreditation Handbook 2016. In general no site visit required for public universities or RTOs. Describes desired educational outcomes and states that the process is intended to provide educators with industry feedback for curriculum development. Also process guidelines - institution does self assessment against detailed criteria The guidelines are congruent with TEQSA's protocols. courseaccreditation@ahri.com.au	No	Offers its own practising certification program AQF 8	Yes		
Australian Marketing Institute AMI www.ami.org.au accreditation@ami.org.au	http://www.ami.org.au/imis15/librarymanager/libs/31/AMI_Part-2_Accreditation_Criteria_Guidelines_(University)_June2010.pdf	No	Yes Offers its own AMI Certified Practising Marketer Program and allows credit transfer for WIL units.	Yes		Require 12 months' notice for new courses or re-accreditation
Tax Practitioners Board	http://www.tpb.gov.au/TPB/Publications_and_legislation/Boa	Registration	No	No		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
www.tpb.gov.au	rd_policies_and_explanatory_information/TPB/Publications_and_legislation/I/0491_TPB_I__07_2011_Approval_process_for_course_providers.aspx Must complete and submit one of 7 course approval request forms for 7 different specialisations. The TPB is of the view that where a course is provided by a university, RTO or other registered higher education institution (for example, a non self-accrediting higher education institution), there are sufficient quality assurance safeguards in place to ensure that the course is provided according to appropriate professional and educational standards and that the course provider has sufficient internal mechanisms to be sustainable. The TPB recognises that universities are subject to regulatory activities and quality assurance mechanisms undertaken by the Tertiary Education Quality and Standards Agency (TEQSA).	as tax agent, BAS agent, financial adviser				
Taxation Institute of Australia www.Taxinstitute.com.au	tti@taxinstitute.com.au 0282230000 Is a registered HEP and offers its own courses			No		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Export Council Australia www.export.org.au	Mainly an advisory and support and training body for the export industry. Offers its own programs in partnership with others agencies including Charles Sturt University.			No		
Finance and Treasury Assoc FTA www.ftasecretariat.com.au	Peak professional body for corporate treasurers and financial risk managers Offers CPD programs.		Yes	No		
Financial Planning Association of Australia FPA including Financial Planning Education Council (FPEC) www.Fpa.asn.au	FPA Accreditation Manager - Belinda Robinson 1300626393, fpa@fpa.asn.au http://fpa.com.au/wp-content/uploads/2015/09/FPEC_accreditationandcurriculumconsultationreleaseversion16Nov2012.pdf Offers its own certification and CPD FPEC intends compliance with TEQSA standards. Detailed guidance paper produced by Financial Planning Education Council in national consultation. Sets out core areas of knowledge. Requires a mapping against requirements of ASIC. Currently draft legislation proposes changes to the	Legislation pending re financial planning certification	Yes	Yes	Fee waived to foster cooperation but may be introduced at later time	Initial 3 year for new program then 5 year re-accreditation

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	requirements for financial planners.					
Australian Institute of Banking & Finance AIBF See FINSIA below						
Financial Services Institute of Australasia FINSIA www.finsia.com	1300346742 info@finsia.com Affiliated with Macquarie University and Applied Finance Centre	No	Yes for financial services industry	No		
Australian Academy of Business and Social Sciences www.aabss.org.au		No	Devoted to research and publication	No		
International						
Institute of Actuaries of Australia www.Actuaries.asn.au education@actuaries.asn.au	Membership based to support actuaries with professional standards and CPD	No	Yes	No		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Chartered Financial Analyst Institute CFA www.cfainstitute.org	Global association of investment professionals. Runs its own exam and courses and is recognised globally.	No	Yes	No		
Chartered Institute of Management Accountants CIMA - now merged with American Institute of CPAs to form CIMAGlobal www.cimaglobal.com Higher Education Partnership Manager advance@cimaglobal.com	http://www.cimaglobal.com/Study-with-us/Exemptions/Exemption-search/ The 2015 CIMA Advance Framework simplifies the existing accreditation process by streamlining the exemptions given to students and graduates from higher education institutions (HEIs) in each country. This new process is available for programs that major in accounting, or accounting and finance. These programs are pre-allocated into Advance Route 1, Advance Route 2 or General Route, depending on the strength of the HEI and its program within the country. There are 42 'exemptions' listed on the database in Australia for university-based courses and some HEPs. Publishes CIMA Professional Qualification Syllabus and conducts assessment to bridge gaps for newly qualified professionals. Very detailed and based on learning outcomes and a Competency Framework that can award exemptions for recognised higher education studies. Uses objective computer based tests and case studies. Completion of assessment allows use of the title ' Chartered Global Management Accountant'.	Chartered	Chartered Global Management Accountant	Yes		

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	Also require 3 years of relevant practical experience					
Association of Advanced Collegiate Schools of Business AACSB International, www.aacsb.edu www.aacsb.edu/accreditation	www.acsb.edu/accreditation/overview http://www.aacsb.edu/~/media/AACSB/Docs/Accreditation/Standards/2013-bus-standards-update.ashx Accreditation includes a rigorous external review of a school's ability to provide the highest quality programs. A comprehensive review of the school's mission, faculty qualifications, and curricula, and the process includes self-evaluations, peer-reviews, committee reviews, and the development of in-depth strategic plans. Accreditation ensures that students are learning material most relevant to their field of study, preparing them to be effective leaders upon graduation. Publishes business standards and accounting standards	No	Maintains a website and rankings on accredited business schools, available jobs etc.	Yes	Initial USD26,000 Annual USD 5400 to 8700	
European Quality Improvement System (EQUIS) managed by European Foundation for management development (EFMD) https://www.efmd.org/	https://www.efmd.org/accreditation-main/equis/equis-guides Comprehensive descriptions of criteria and standards at institutional and course level; extremely comprehensive guidance on processes and self assessment, peer review etc.	No	No	Yes	Euro 52,8000 5 years; 46,200 3 years; 36,300 for new applications	

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
accreditation-main/equis						
London-based Association of MBAs (AMBA) www.mbaworld.com accreditation@mbaworld.com	http://www.mbaworld.com/Accreditation/Become-an-accredited-business-school.aspx Comprehensive manuals cover criteria and processes for MBA, DBA, MBM. Outcomes focus, institutional as well as course level. Four stage process: 1. Determine eligibility, 2. pre-assessment, 3. assessment, 4. post-assessment and decision.	No	Corporate	Yes -	GBP Stage 1 GBP2,000stage 2 GBP5,000stage 3 GBP15,000 plus panel expenses plus additional program or O/S costs plus annual GBP4,500 fee.	New schools can be accredited for 3 or 5 years and re-accreditation can be for 1,2,3 or 5 years
International Federation of Accountants www.ifac.org	IFAC has over 175 professional accounting organisation members, associates and affiliates in over 130 countries. Australian members are CAANZ, CPA, IPA. Its International Accounting Education Standards Board (IAESB) is an independent standard-setting body that prescribes skills, values, ethics and attitudes. Produces guidelines to support implementation of a learning outcomes		Corporate			

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
	approach. www.iaesb.org					
Association of International Accountants AIA www.aiaworldwide.com	Recognised in UK and offers 3 certificate and diploma level qualifications for statutory auditors. Members can call themselves FAIA if they have qualifications plus experience		Yes	No		
International Advertising Association IAA www.iaa.org.au	Global program, 10 courses accredited in Australia.			Yes	USD3000	3-5 years
AHPRA REGISTERED HEALTH PROFESSIONS						
Australian Pharmacy Council www.pharmacycouncil.org.au accreditation@pharmacycouncil.org.au	Standards 2014 Accreditation QA and Monitoring Policy 2015 https://www.pharmacycouncil.org.au/media/1134/t-606-1-pharmacy-degree-program-application-for-accreditation.pdf Director, Accreditation, Claire Bekema	Yes	No	Yes	New program $30,000 annual fee $18,000	Annual Reporting

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Australian Physiotherapy Council www.physiocouncil.com.au accreditation@physiocouncil.com.au	Physiotherapy Practice Thresholds 2015 https://physiocouncil.com.au/accreditation/accreditation-resources/	Yes	No	Yes	Initial $24,000 + site visit Annual $15,800	Annual reporting and 5years max
Australian Medical Council www.amc.org.au	Standards for assessment of programs 2012 Procedures for assessment 2015 http://www.amc.org.au/accreditation/primary-medical-education	Yes	No	Yes	Stage 1 $10,000 plus cost recovery Report and site visit $7,500	Up to 10 years with progress reports at 1,3,5,7,9 years
ANZ Podiatry Accreditation Council www.anzpac.org.au	Accreditation Standards 2015 Accreditation procedures 2014 www.anzpac.org.au/accreditation.htm	Yes	No	Yes	$30000 incl 1 site visit	Up to 5yrs. Annual reports
Australian Nursing and Midwifery Accreditation Council www.anmc.org.au	RN Accreditation Standards 2012 National guidelines for accreditation 2015 http://www.anmac.org.au/sites/default/files/documents/National_Guidelines_for_the_Accreditation_of_Nursing_and_Midwifery_Programs_0.pdf	Yes	No	Yes	$38,100 initial accreditation fee.	Annual declarations required

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Chinese Medicine Accreditation Committee http://www.chinesemedicineboard.gov.au/Accreditation.aspx accreditation.unit@ahpra.gov.au	Accreditation process 2013 - review 2016 http://www.chinesemedicineboard.gov.au/Accreditation/Application-information.aspx Margaret Grant, Program Manager Accreditation	Yes	No	Yes.	Initial $12,000 - $20,000 Annual $4000 - $8000	No set period. Annual declarations required
Australian Osteopathic Accreditation Council AOAC www.osteopathiccouncil.org.au	Standards 2016 Procedures 2012 http://www.osteopathiccouncil.org.au/files/ANZOC%20Accreditation%20Procedures%20-%20August%202010%20V2.pdf	Yes	No	Yes	Initial $20000, major change $5000, annual fee $5000	Up to 5 years
Aboriginal and Torres Strait Islander Health Practice Accreditation Committee	Margaret Grant, Program Manager Accreditation	Yes	No	RTOs only		
Australian Dental	Accreditation Standards 2014	Yes	No	Yes	New dental	Up to 7 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Council www.adc.org.au	Accreditation guidelines 2016 http://www.adc.org.au/documents/Professional%20Competencies%20of%20the%20Newly%20Qualified%20Dentist%20-%20February%202016.pdf Michael carpenter, Director Accreditation, michael.carpenter@adc.org.au				program $44,000 annual fee $19,800	with annual reporting
Council on Chiropractic Education Australasia CCEA www.ccea.com.au	Competency based standards 2009 Accreditation procedures 2015 http://www.ccea.com.au/index.php/accreditation/accreditation-documentation/	Yes	No	Yes		Annual reports required. Re-accreditation at least every 5 years.
Optometry Council of Australia & NZ OCANZ www.ocanz.org	Accreditation Process & Procedures 2012 Accreditation Standards - under review 2016 http://www.ocanz.org/documents/accreditation-1/5-ocanz-accreditation-manual-part-1-1/file Accreditation Manager Susan Kelly, s.kellly@ocanz.org	Yes	No	Yes	Initial $60,000 Annual $8,800. Annual CPI.	Up to 8 years
Medical Radiation Practice Accreditation	Accreditation Standards 2013 Supersedes accreditation process formerly managed by	Yes	No	Yes	Assessment fee $20,000 to	No set period. Require

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
Committee MRPAC http://www.medicalradiationpracticeboard.gov.au/Accreditation/Accreditation-Committee.aspx	Australian Institute of Radiography http://www.medicalradiationpracticeboard.gov.au/Accreditation/Application-information.aspx Margaret Grant, Program Manager Accreditation accreditation.unit@ahpra.gov.au				$30,000. Annual fee $4000	annual report and monitoring
Australian Psychological Accreditation Council www.psychologycouncil.org.au apac@psychologycouncil.org.au	APAC Rules for Accreditation and Accreditation Standards 2010 https://www.psychologycouncil.org.au/Assets/Files/APAC_Accreditation_Assessment_Handbook_ver_7_March_2014.pdf New standards currently under consultation.	Yes	Eligible for membership Australian Psychologic-al Society	Yes	Sliding: on shore vs off shore + costs for each specialisatio-n. Initial for single UG course ~$25,000	5 years with annual reporting
Occupational Therapy Council (Aust & NZ) OTC http://otcouncil.com.au/	Accreditation guidelines 2015 http://otcouncil.com.au/wp-content/uploads/2012/09/Accred-Standards-December-2013.pdf Rebecca Allen Manager/Professional Adviser Program Accreditation: rebecca@otcouncil.com.au; 0893682655	Yes	No	Yes	Initial $6,300 Site visit $6,300 $8,300 annual fee rising by $400 each year	Monitoring and 5 yearly assessment cycle

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
HEALTH PROFESSIONS NOT REGISTERED BY AHPRA						
Dietitians Association of Australia www.daa.asn.au	http://daa.asn.au/wp-content/uploads/2015/12/NCS-Dietitians-Australia-with-guide-1.0.pdf Developed a credentialing system for use of title Accredited Practising Dietitian (APD) which is protected by Law and recognised by the Australian Government, Medicare and DVA and private health funds. Standards currently under review (2016) to increase focus on learning outcomes. Kristy Bartlett APD, Accreditation Manager – accreditation@daa.asn.au	No	Yes	Yes	Initial $11,605 $8,750 Annual review fee payable each year	Maximum 5 years
Nutrition Society of Australia NSA www.nsa.asn.au		No	NSA has established voluntary register	No.		
Speech Pathology Australia Speechpathologyaustrali	Accreditation of Speech Pathology Degree programs 2015 http://www.speechpathologyaustralia.org.au/spaweb/Document_Management/Public/Become_a_Speech_Pathologist.aspx.	No	Eligible for member-ship of SPA	Yes	Not published - increase every year	Full accreditation 5 years, provisional 2 years. Annual

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
a.org.au saps@speechpathologyaustralia.org.au	Stacey Baldac, Senior Advisor, Professional Standards					report.
Exercise and Sports Science Australia www.essa.org.au	New standards and accreditation process implemented in 2016 https://www.essa.org.au/higher-education-providers/reaccreditation/ Graduates of specific accredited programs are eligible for Accredited Exercise Scientist or Accredited Exercise Physiologist status (for healthcare provider numbers). The process is the National University Course Accreditation Program (NUCAP) Rachel Holmes, Accreditation Manager rachel.holmes@essa.org.au	No	Yes	Yes	$30-40,000	5 years
Psychotherapy and Counselling Federation of Australia www.pacfa.org.au	www.pacfa.org.au/resources http://www.pacfa.org.au/wp-content/uploads/2012/10/Course-Accreditation-and-Application-Guidelines-March-2015.pdf	Inclusion on Australian Register of Counsellors and Psycho-	Yes	Yes - AQF levels 7,8,9	$4,620 for 7 or $3,300 for 5 years	Maximum 7 years to align with TEQSA

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
		therapists				
Diversional Therapy Association of Australia - National Council DTAANC www.diversionaltherapy.org.au	Portals/0/DTA Course Recognition Application Form Full Mem Degree Qualified.pdf Standards focus on course content, volume, nature of training.	No	DTA member if graduate of accredited course	Yes	$2,999 application fee	
Australian OHS Education Accreditation Board www.ohseducationaccreditation.org.au	http://www.ohseducationaccreditation.org.au/providers/	No	Of Safety Institute of Australia	Yes	$7,000-10,000 Subsidised by Safety Institute of Australia	Full accreditation is 5 years, provisional 2 years. Able to be adjusted
Australian Institute of Occupational Hygienists AIOH admin@aioh.org.au;	Two Masters level courses are accredited at Edith Cowan University and University of Wollongong.	Certification through exam	To graduates of accredited courses	Yes	No fee	5 years with annual report

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
www.aioh.org.au						
Australian Institute of Environmental Health; Environmental Health Australia www.AIEH.org.au	http://www.eh.org.au/about-us/national-policies Victoria Mohkami, National Executive Officer; national@eh.org.au	No	Yes	Yes, AQF level 7,8,9	$3,500	5 years maximum
Australian College of Health Services Management achsm@achsm.org.au	Competency Framework out for consultation. Standard policy and guidelines.	No	Member-ship of College	Yes	$8,800 flat	4 years
ANZ Arts Therapy Association ANZATA www.anzata.org	Jo Kelly, President@anzata.org Requires minimum 2 year Masters with 750 supervised clinical hours placement in the mental health arena	Graduates eligible for Professional Registration with ANZATA	Yes	Recognition		
Australian Music Therapy Association AMTA	http://www.austmta.org.au/content/accreditation-document-2009	Yes, through AMTA	Yes	Yes	Validation fee to cover site visit $2500	5 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
www.austmta.org.au	president@austmta.org.au Must be affiliated with a university and have SSR of 1:16. Criteria input based, related to hours of practicals, clinics etc. Aligned with World Federation of Music Therapy which stipulates no less than two years. Including significant hours in supervised clinical training.					
Australian Natural Therapists Association www.australiannaturaltherapistsassociation.com.au	http://www.australiannaturaltherapistsassociation.com.au/downloads/courses/ANTA_courseassessmentguidelines.pdf Guidelines for course hours and broad percentage times for course content. Courses re-accredited by ANTA Academic Committee and forwarded to ANTA Accreditation Board who recommend to ANTA National Council.	No	Yes	Yes	Free	
Australian Traditional Medicine Society ATMS www.atms.com.au		No	Yes to grads of accredited courses	Not at university level		
National Herbalists Association of Australia	http://www.nhaa.org.au/education/course-accreditation-	No	Yes	Yes	$990 for 4	4 years

Accrediting Agency / Professional Body	Accreditation details	National registration	Membership	Formal accredit - ation	Fee (July 2016)	Cycle
NHAA www.nhaa.org.au	system-cas/for-institutions-teachers Mostly Vocational Education and Training providers, although University of New England offers a Grad Dip and a Masters in Health Science (Herbal Medicine)				years	

APPENDIX 2 COMPLIANCE WITH 'UNIVERSITIES AUSTRALIA / PROFESSIONS AUSTRALIA JOINT STATEMENT OF BASIC PRINCIPLES FOR ACCREDITATION'

PROFESSIONAL ACCREDITATION STANDARDS

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
BUSINESS DISCIPLINES								
CPA/CAANZ	✓	✓	✓	✓	MOU Accepts TEQSA registration as sufficient for QA and governance	✓	✓	✓
Institute of Public Accountants	✓	✓		✓	✓			

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Australian Human Resource Institute	AHRI Model of excellence	✓	✓	✓	✓	✓	✓	✓
Australian Marketing Institute	✓	✓	✓	✓	✓	✓	✓	✓
Financial Planning Education Council	✓	✓		✓	✓	✓	✓	✓
Public Relations Institute of Australia	✓	✓	✓	✓		✓	✓	✓
Tax Practitioners Board	✓	✓		✓	✓		✓	✓
EDUCATION								
Australian Institute for Teaching and School Leadership	✓	✓	✓	✓	MOU	✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
ENGINEERING								
Engineers Australia/ Institution of Engineers	✓	✓	✓	✓	MOU	✓	✓	✓
INFORMATION SCIENCES								
Australian Computing Society	Core Body of Knowledge	✓	Seoul Accord	✓	Only accredits TEQSA approved courses	✓	✓	✓
Records & Information Management Professionals of Australasia	Statement of Knowledge	✓		✓		✓	✓	✓
Australian Library & Information Association	Core Knowledge, Skills & Attitudes	✓		✓	✓	✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Australian Society of Archivists	Statement of Knowledge	✓		✓	Non-specific	✓	✓	✓
LAW								
Law Admissions Consultative Council	Content prescribed as learning outcomes but mostly input based criteria – LACC discussion paper suggesting more strictures on inputs	✓ Must cover 11 substantive content areas (Priestley 11)	Maintains awareness of UK reforms	✓	Current LACC discussion document appears to reject reliance on TEQSA accreditation	✓	✓	✓
SCIENCE								

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Australian Institute of Physics	List of competencies	✓		✓		✓	✓	
Statistical Society of Australia	More inputs focused		✓	✓			✓	✓
Australian Veterinary Boards Council	✓	✓	✓	✓	Finalising MOU with TEQSA	✓	✓	✓ Each year 3 of 12 standards are reviewed
Royal Australian Chemical Institute	Revised guidelines not yet available. Revised outcomes based accreditation in operation since 2015.							
Australian Institute of Architects/ Architects Accreditation Council of Australia	National Standard of Competency for Architects with four units	Stipulates expectation of 10 semester structure over 5 years F/T	✓	✓	✓	✓	✓	✓ Recent review

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
	of competence							
Australian Institute of Landscape Architects	✓ Specifies coverage of key areas	Requires AQF8 or 9		✓	Standards developed to meet TEQSA accreditation requirements	✓	✓	✓
Planning Institute of Australia	Competencies under review	✓		✓	✓	✓	✓	✓
Australian Institute of Building	Competency standards aligned with National Building Professionals Register and National Licencing	✓	✓	✓	Outlines relationship of process to TEQSA approval	✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
SOCIAL WORK								
Australian Association of Social Workers	Graduate attributes + minimum hours and staff numbers Currently under review	✓		✓	✓ Revised standards committed to integration with TEQSA	✓	✓	✓
HEALTH PROFESSIONS – NOT REGISTERED BY AHPRA								
Speech Pathology Australia	Competency based Occupational Standards (CBOS)	✓	✓	✓		✓	✓	✓
Dietitians' Association of Australia	National Competency Standards.	Currently revising to be less input driven				✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Diversional Therapy Association	Specifies minimum content			✓	✓		✓	
Australian College of Health Services Management	Competency framework	✓		✓		✓	✓	✓
Australian OHS Education Accreditation Board	Body of Knowledge	✓	✓ International Network of Safety & Health Practitioner Organisations And UK and USA	✓	✓ Structure of accreditation criteria aligned with HESF	✓	✓	✓
Environmental Health Australia	EHO Knowledge & Skills matrix	✓		✓		✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Exercise & Sports Science Association	✓	Very detailed and prescriptive inputs although recent review has decreased prescription	✓	Duplication of academic and TEQSA QA criteria and processes	✓	✓	✓	✓ Recent review implemented change in 2016
Psychotherapy & Counselling Federation of Australia	✓	✓		✓	Invite document submission in TEQSA format	✓	✓	✓
Australasian College of Physical Scientists & Engineers in Medicine	AQF Level 9	Suggest syllabus & unit content & volume		✓			✓	
HEALTH PROFESSIONS – REGISTERED BY AHPRA								
Aboriginal and Torres Strait	Does not accredit higher education level programs							

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ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Islander Health Practice Accreditation Committee								
ANZ Podiatry Accreditation Council	Competency Standards for ANZ	✓		✓		✓	✓	✓
Australian Medical Council	Graduate Outcome Statements	✓	✓	✓	MOU	✓	✓	✓
Australian Nursing & Midwifery Council	Competency statements and scope of practice	✓	✓	✓	✓	✓	✓	✓
Australian Psychological Accreditation Council	Core capabilities and attributes	Prescriptive in terms of staffing and other inputs including course content and duration	✓	✓ Accredit AOU as well as programs. Offers design assistance for	✓	✓	✓	✓ Recent review not yet impl-emented

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ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
				new course design.				
Australian Dental Council	Professional competencies of entry level practitioner	✓	✓	✓	MOU	✓	✓	✓
Australian Osteopathic Accreditation Council	Competency standards	✓	✓	✓	✓	✓	✓	✓
Australian Pharmacy Council	Inputs and outcomes based	✓	✓	✓	✓ Some overlap with HESF/TEQSA	✓	✓	✓
Australian Physiotherapy Council	Physiotherapy Practice Thresholds	✓	✓	✓		✓	✓	✓

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
Chinese Medicine Accreditation Committee	✓ Outlines 'Professional Capabilities'	✓	✓	✓	✓ Specifies requirements of HESF/TEQSA	✓	✓	✓
Council on Chiropractic Education Australasia	Competency based standards	✓	✓	✓			✓	✓ Recent review not yet impl-emented
Medical Radiation Practice Accreditation Council	Competency based standards	✓	✓	✓	✓	✓	✓	✓
Occupational Therapy Council (ANZ)	Australian competency standards for	✓	✓	✓	✓	✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	OUTCOMES BASED	FLEXIBILITY	BENCHMARKS	HE CONTEXT	TEQSA AWARE	CONSULT STAKE - HOLDERS	PUBLISH	REVIEW
	new graduates							
Optometry Council of ANZ	Standards manual developed in 2006. In consultation process for review 2016.							

PROFESSIONAL ACCREDITATION PROCESSES

ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
BUSINESS										
CPA/CAANZ	✓	✓	✓	✓	✓	✓	✓	✓		✓
Institute of Public Accountants			✓	✓						
Australian Human Resource Institute	✓		✓		✓	Site visit not usual			✓	
Australian Marketing Institute	✓	✓	✓	✓	✓	✓				✓
Financial Planning Education Council	✓	✓	✓	✓	✓	✓			✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Public Relations Institute of Australia	✓	✓	✓	✓	✓	✓		✓		
Tax Practitioners Board	✓	✓	✓	✓	✓				✓	
EDUCATION										
Australian Institute for Teaching & School Leadership	✓	✓	✓	✓	✓	✓	✓		✓	
ENGINEERING										
Engineers Australia/ Institution of Engineers	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
INFORMATION SCIENCES										
Australian Computing Society	✓	✓	✓	✓	✓	✓	✓			
Records & Information Management Professionals of Australasia	✓	✓	✓	✓	✓	✓				✓
Australian Library & Information Association	✓	✓	✓	✓	✓	✓				✓
Australian Society of Archivists	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LAW										

ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Law Admissions Consultative Council	Each jurisdiction has its own processes which reference common standards for content and entry level practitioner skills. The standards have been developed by the Council of Australian Law Deans and the LACC. Processes and non-core criteria are not specified at national level and tend to vary between jurisdictions. Proposal currently under development for more structured, national coherent approach to delivery methods and frequency of accreditation.									
SCIENCE										
Australian Institute of Physics	✓	✓	✓	✓	✓	✓			✓	
Statistical Society of Australia	✓		✓		✓					
Australian Veterinary Boards Council	✓	✓	✓	✓	✓	✓	✓ Est cost to train new site visit members from 2017	✓		✓

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ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
							$1700 borne by AVBC			
Royal Australian Chemical Institute	New guidelines not yet available – Revised outcomes based accreditation process in operation since 2015									
SOCIAL WORK										
Australian Association of Social Workers	✓	✓	✓	✓	✓	✓	✓	✓		
ARCHITECTURE, BUILDING, PLANNING										
Australian Institute of Architects/ Architects Accreditation Council of	✓	✓	✓	✓	✓	✓		✓	✓	✓

ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Australia										
Australian Institute of Landscape Architects	✓	✓	✓	✓	✓	✓		✓	✓	
Planning Institute of Australia	✓	✓	✓	✓	✓	✓		✓		✓
Australian Institute of Building	✓	✓	✓	✓	✓	✓		✓	✓	✓
Australian Institute of	✓	✓	✓	✓	✓	✓			✓	✓

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ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Quantity Surveyors										
HEALTH PROFESSIONS – NON REGISTERED										
Speech Pathology Australia	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Dietitians' Association of Australia	✓	Specifies minimum staffing & resources	✓	✓	✓	✓				✓
Diversional Therapy Association	✓	✓	✓		✓					
Australian College of Health Services Management	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

Information in Appendices was collated in October 2016

ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Australian OHS Education Accreditation Board	✓	✓	✓	✓	✓ Structure aligned with institutional and external QA processes to minimise complexity	✓		✓		✓
Environ-mental Health Australia	✓	✓	✓	✓	✓	✓		✓	✓	
Exercise & Sports Science Association	✓	Specifies staff numbers, laboratory space etc	✓	✓	✓	✓	Training manual, webinar	✓	✓	

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ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Psycho-therapy & Counselling Federation of Australia	✓	✓	✓	✓	✓	✓	✓	✓	✓	
Australasian College of Physical Scientists & Engineers in Medicine	✓	✓	✓	✓	✓				✓	
HEALTH PROFESSIONS – REGISTERED BY AHPRA										
Aboriginal and Torres Strait Islander Health Practice Accreditation Committee	Does not accredit higher education programs									

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ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
ANZ Podiatry Accreditation Council	✓	✓	✓	✓	✓	✓			✓	
Australian Medical Council	✓	✓	✓	✓	✓	✓	Handbook for assessors	✓	✓	✓
Australian Nursing & Midwifery Council	✓	✓	✓	✓	✓	✓		✓	✓	
Australian Psychological Accreditation Council	*	✓	✓	✓	*Assesses the provide and AOU as well as program.	✓	Hand-book, training & certification	✓	✓	

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ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Australian Dental Council	✓	✓	✓	✓	✓	✓	✓ Training and manual	✓	✓	✓
Australian Osteopathic Accreditation Council	✓	✓	✓	✓	✓	✓		✓	✓	✓
Australian Pharmacy Council	✓	✓	✓	✓	✓	✓		✓	✓	✓
Australian Physiotherapy Council	✓	✓	✓	✓	✓	✓	Publish guide for panel members	✓		✓

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ACCREDITATION AGENCY	ROLES OF HEP	INFRASTRUCTURE	CRITERION REFERENCED	TRANSPARENCY	COMPLEMENTARY TO ACADEMIC ACCREDITATION	PANEL SCOPE	PANEL TRAINING	COI	APPEALS	SHARE INFO
Chinese Medicine Accreditation Committee	✓	✓	✓	✓	✓	✓	✓			✓
Council on Chiropractic Education Australasia	✓	✓	✓	✓	✓				✓	✓
Medical Radiation Practice Accreditation Council	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Occupational Therapy Council (ANZ)	✓	✓	✓	✓		✓		✓		✓
Optometry Council of ANZ	✓		✓	✓	✓	✓	Template for team report	✓	✓	✓

Information in Appendices was collated in October 2016

Information in Appendices was collated in October 2016

APPENDIX 3 REQUEST FOR INPUT

Mapping of professional accreditation in the context of higher education regulatory and standards frameworks

The Department of Education and Training has commissioned PhillipsKPA to survey and characterise the extent and scope of professional course accreditation practices in Australian higher education. The project aims to examine a range of dimensions, including the scope of professional accreditation arrangements, the practical impact on institutional operations, the perceived advantages and disadvantages and the effect of professional accreditation on innovation in course design. Input is being sought from universities, other registered higher education providers, professional bodies and student groups.

The work will be undertaken between July and December 2016 and the project report will inform work being undertaken by the Higher Education Standards Panel to provide advice to the Minister for Education and Training on the impact of professional accreditation on Australian higher education and opportunities that may exist to reduce regulatory burden for higher education providers.

We are seeking input on the following issues specifically but would welcome any information that respondents deem relevant to the topic. Please feel free to provide examples to illustrate your responses. There are two sets of questions which are intended not as a survey but as a prompt for your thinking. The firsts et is for higher education providers. The second set is for accrediting bodies.

All responses will be confidential to PKPA consultants and the report analysis will not include identifiable examples or respondents.

Responses would be appreciated by Friday 9th September.

Please address all enquiries and responses to the Project Lead:

Emeritus Professor Christine Ewan
Key Associate PhillipsKPA
cewan@phillipskpa.com.au
Mob: 0419970578

ISSUES FOR HIGHER EDUCATION PROVIDERS TO ADDRESS

1. What is the practical impact of professional accreditation on institutions?

We have identified at least 60 bodies that offer formal accreditation services to universities, most of which are essential if graduates are to find professional employment. We would welcome examples of both good and poor practice in accreditation as well as descriptions of the scale and nature of the financial and opportunity cost burden to the institution and the extent to which infrastructure for managing accreditation is aligned with other regulatory systems such as ESOS and TEQSA.

2. Are there advantages and/or disadvantages to professional accreditation processes as they are currently managed? What are they?

We are interested in receiving perceptions on this question from the point of view of institutions, professions, employers and students/graduates.

3. Are there trends emerging in professional accreditation that you are aware of and are the bodies you are associated with adopting them? What new approaches are emerging?

For example, are accreditation standards becoming more outcomes rather than inputs based, are standards beginning to reflect or foreshadow future modes of professional practice? Are the standards established by the Higher Education Standards Framework (HESF) and by professional bodies congruent?

4. Does accreditation make innovation in course design more difficult, or does it encourage innovation?

For example, are accreditation criteria too prescriptive to allow for significant departures from traditional teaching methods? Are prescriptions of course content or contact hours inhibiting innovation in curriculum? Are there innovations you would like to introduce that are being hampered by regulatory criteria?

5. How do international professional recognition requirements impact on course design in your discipline(s)? Do these requirements mesh easily with internal academic quality assurance, the HESF and the TEQSA process? What, if any, are the problems?

6. What could be done to streamline the various regulatory, quality assurance and professional accreditation processes to reduce the burden on institutions?

ISSUES FOR ACCREDITING AGENCIES TO ADDRESS

1. Are your accreditation practices examples of good practice?

For example:

- Are the accreditation criteria in your profession open to evolution of professional practice in the future?
- Are you confident that the criteria do not reinforce stagnation or stifle innovation?
- Do your accreditation processes and criteria take the Higher Education Standards Framework and TEQSA accreditation into account?
- Do you look for evidence of benchmarking of learning outcomes and course design?
- How often do you review professional accreditation standards and processes and what do you address in reviews?
- How does international accreditation impact on your accreditation practices?

2. Do the relationships between stakeholders work for your profession?

For example:

- What issues (positive and negative) emerge in your relationships with education providers?
- What is the relationship with the profession in general, with industry and employers – how do their needs guide criteria or processes? For example, is there an intersection between industrial relations and accreditation?
- How do you fund the accreditation process and determine your fees?
- How do you choose and train reviewers?
- If your organisation offers its own training programs is there the potential for any perceived or actual conflict of interest?

3. What advice do you have that could improve the process for all stakeholders?

For example:

- Have efforts been made to analyse costs and benefits or to benchmark accreditation practices within Australia or overseas?

- Is there duplication of effort that could be rationalised by better inter - professional cooperation?

- Are there opportunities for better alignment with TEQSA processes eg aligning 7 year cycles, sharing expert reviewers, adopting a more risk based approach, accepting TEQSA registration as satisfying institutional criteria such as governance and QA processes

APPENDIX 4 LIST OF RESPONDENTS AND/OR PARTICIPANTS IN CONSULTATION MEETINGS

1.1 WRITTEN RESPONSES

ACCREDITATION AGENCIES

Architects Accreditation Council of Australia

Australasian Sonographers Association

Australasian Veterinary Boards Council

Australian Association of Social Workers

Australian Computer Society

Australian Dental Council

Australian Health Practitioner Regulation Agency

Australian Human Resources Institute

Australian Institute of Landscape Architects

Australian Institute of Project Management

Australian Institute of Quantity Surveyors

Australian Library & Information Association

Australian Marketing Institute

Australian Medical Council Limited

Australian Music Therapy Association

Australian Nursing and Midwifery Accreditation Council

ANZ Art Therapy Association

Australian Occupational Health & Safety Accreditation Board

Australian Orthotic Prosthetic Association

Australian Pharmacy Council

Australian Psychological Accreditation Council

Australian Psychological Society

Australian Society of Archivists

Australian Society of Medical Imaging and Radiation Therapy (formerly Australian Institute of Radiography)

CPA Australia

Chartered Accountants of Australia and New Zealand

Chinese Medicine Accreditation Committee

Chiropractors' Association of Australia

Council on Chiropractic Education Australasia

Dietitians Association of Australia

Engineers Australia

Environmental Health Association

Exercise and Sports Science Australia

Financial Planning Association of Australia

Health Information Management Association of Australia

Health Professions Accreditation Councils' Forum

Institute of Public Accountants

Institution of Chemical Engineers

International Network for Quality Assurance Agencies in Higher Education

Law Admissions Consultative Committee

Medical Radiation Practice Accreditation Committee

Occupational Therapy Council (Australia and New Zealand)

Occupational Therapy Australia

Optometry Council of Australia and New Zealand

Planning Institute of Australia

Professions Australia

Psychotherapy and Counselling Federation of Australia

Records and Information Management Professionals Australasia

Royal Australian Chemical Institute

Speech Pathology Australia

Statistical Society of Australia

Tax Practitioners Board

The Law Council of Australia

The-ICE (International Centre of Excellence in Tourism and Hospitality Education)

Victorian Legal Profession Admission Board

HIGHER EDUCATION PROVIDERS

Universities

Universities Australia Health Professional Education Standing Group

Charles Sturt University

Deakin University

Edith Cowan University

Faculty of Health Sciences, the University of Sydney

Flinders University

Griffith University

Group of 8 Universities

James Cook University

LaTrobe University

Macquarie University

Monash University

Murdoch University

Queensland University of Technology

Royal Melbourne Institute of technology

Southern Cross University

The University of Sydney

University of Canberra

University of Notre Dame Australia

University of South Australia

University of Melbourne

University of Queensland

University of Queensland Business School

University of Queensland Medical School

University of the Sunshine Coast

University Technology Sydney

University of Southern Queensland

University of Tasmania

Western Sydney University

Councils of Deans

Australian Council of Deans of Education

Australian Council of Deans of Health Sciences

Australian Council of Deans of Science

Australian Council of Engineering Deans

Council of Australian Law Deans

Council of Deans for Nutrition and Dietetics (Australia/New Zealand)

Deans of Arts Social Sciences & Humanities

Heads of Departments and Schools of Psychology Association

Veterinary Schools of Australia and New Zealand

Non University Higher Education Providers

Australian Council for Private Education and Training

TAFE Directors Australia

1.2 CONSULTATION MEETINGS

Professions Australia

Director of Regulation and Review. TEQSA

TEQSA Briefings of Professional Bodies

Deputy Vice Chancellors (Academic) Executive Group

Deputy Vice Chancellors (Academic) Group

Australian Council of Deans of Education Executive

Universities Australia's Health Professional Education Standing Group.

Acting Director, Queensland College of Teachers

Client relations (Australasia) Educational Testing Service Global

Mr Michael Woods, Independent Review of NRAS Accreditation Systems

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