



Aboriginal and Torres Strait  
Islander Health Practice  
Chinese Medicine  
Chiropractic  
Dental  
Medical  
Medical Radiation Practice  
Nursing and Midwifery  
Occupational Therapy  
Optometry  
Osteopathy  
Pharmacy  
Physiotherapy  
Podiatry  
Psychology

Australian Health Practitioner Regulation Agency

## Expression of Interest – Accreditation functions for the paramedicine profession

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4 June 2018

### Overview

**Title of engagement:** The accreditation function for paramedicine

The Paramedicine Board of Australia (Board) is seeking expressions of interest from potential accreditation entities to undertake the accreditation functions for paramedicine as set out in section 42 of the Health Practitioner Regulation National Law (National Law)<sup>1</sup>.

**Closing date:** 9 July 2018.

**Contact:** Paul Fisher, Executive Officer Paramedicine

### Background

#### The national regulation of paramedics

The national regulation of paramedics is expected to start in late 2018. The Paramedicine Board of Australia (Board) and Australian Health Practitioner Regulation Agency (AHPRA) are undertaking an intensive program of work to ensure that the Board has the necessary regulatory infrastructure required for the regulation of the paramedicine profession. Paramedics are not currently required to be registered in any state or territory so national regulation will represent a significant change for the profession.

#### The National Board

In October 2017, The COAG Health Council appointed the inaugural Paramedicine Board of Australia (the Board). The Board works in partnership with 14 other National Boards and AHPRA to implement the National Registration and Accreditation Scheme (National Scheme). The aim of the National Scheme is to protect the public by ensuring that only suitably trained and qualified practitioners are registered. It also facilitates workforce mobility across Australia, the provision of high quality education and training of health practitioners; and rigorous assessment of overseas practitioners.

While the primary role of the Board is to protect the public through setting standards and regulatory decision-making, the Board is also responsible for registering practitioners and students, as well as other functions for the profession, including the accreditation function set out in Part 6 of the National Law.

#### AHPRA

AHPRA supports the operations of the National Boards for each profession covered by the scheme, and the state and territory boards and committees established by the National Boards.

The services provided by AHPRA to the National Boards employ best practice approaches to regulation and cover registration functions, the management of a national public register of health practitioners, the receipt of complaints on behalf of the National Boards and, subject to decisions by states and territories, responsibility to the National Boards for the highest standards of professional investigations and disciplinary prosecutions.

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<sup>1</sup> As enacted in each state and territory.

AHPRA is responsible for engaging external authorities on behalf of National Boards.

## Accreditation function

The Board has agreed to start an open and transparent process to assign the accreditation functions for the paramedicine profession to undertake the accreditation activities as set out in section 42 of the National Law. These activities include:

- developing accreditation standards and recommending them to the Board for approval
- accrediting and monitoring education providers and programs of study to ensure that graduates are provided with the knowledge, skills and professional attributes to safely practise the profession in Australia
- providing advice to the Board about issues relating to their accreditation functions
- assessing overseas qualified practitioners, and
- assessing overseas accrediting authorities.

The first four activities are key functions carried out by many of the accreditation authorities assigned by other National Boards, and in the context of this expression of interest are mandatory functions. Some accreditation authorities, but not all, also have the function of assessing overseas accrediting authorities. Given the lack of paramedic course accreditation globally, this is not a required element of this expression of interest.

All accreditation entities, whether external authorities or committees, are independent of National Boards in making accreditation decisions under the National Law.

For more information on the accreditation function see [Accreditation under the National Law Act](#).

The objectives and guiding principles of the National Law apply to all functions under the National Law, and those exercising those functions, including the accreditation functions.

Additionally any individual, group or organisation assigned a function under the National Law by the Board is bound by the same privacy and public record-keeping obligations as AHPRA and the National Boards.<sup>2</sup>

### **The Board**

The National Law sets out in section 43 that the Board must decide whether the accreditation function for the paramedicine profession is to be exercised by either an external accreditation entity or a committee established by the Board.

The Board has not made a decision under section 43 at this stage.

Given the early stage of the Board's operation, and drawing on the experience of other National Boards with accreditation arrangements in the National Scheme, the Board has chosen to seek expressions of interest (EOI) to carry out the accreditation functions for the paramedicine profession. The Board will consider each EOI in the context of the decision to assign the function to either an external entity or a committee established by the Board. Should the Board decide to assign the function externally, shortlisted entities as a result of this EOI process may be invited to participate in a selective Request for Proposal (RFP) process.

The Board has duly noted the pending the outcome of the Accreditation Systems Review (ASR)<sup>3</sup>, and the time-limited transitional provisions in the National Law (section 310), during which it can approve the Council of Ambulance Authorities (CAA) accredited paramedicine programs. Nevertheless, the Board has determined that starting the process to assign accreditation functions for paramedicine and oversee the establishment and implementation of accreditation infrastructure for the profession is a priority and should start as soon as possible.

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<sup>2</sup> See Part 10 of the National Law and PROS 10/10 G2 Managing Records of Outsourced Activities Guideline ([www.prov.vic.gov.au](http://www.prov.vic.gov.au)).

<sup>3</sup> <http://www.coaghealthcouncil.gov.au/Projects/Accreditation-Systems-Review>.

It is estimated there are currently at least 20 programs potentially suitable for accreditation being offered through 16 different universities across Australia. This is the expected initial scope of program accreditation work for a paramedicine accreditation authority. The scope of work for an accreditation authority responding to this EOI does not include paramedicine programs delivered outside Australia. This reflects the national scope of the Board's regulatory reach. It is customary for National Boards to assign accreditation functions for a set period, usually between three to five years. Before the end of the assigned period, the Board will review these arrangements before the end of the assigned period.

### **Recent history of accreditation and the National Scheme**

It is important that any entity seeking to offer an EOI understand the background and recent history relevant to the exercise of the accreditation functions under the National Law.

Two reports on accreditation arrangements are currently under consideration by governments. First, the [Accreditation Systems Review](#) (ASR) has carried out a dedicated, comprehensive review of accreditation in the National Scheme and its September 2017 draft report proposed some potential improvements. The National Boards and AHPRA have published a shared submission to the draft report which indicates their willingness to progress improvements in the context of the Health Ministers' response to the ASR.

The ASR reported to COAG Health Council in late 2017 and the final report of the ASR and Health Ministers' response, which will set the future direction for accreditation in the National Scheme, are not yet available. Importantly, the ASR draft report indicated that any substantial change in accreditation arrangements would need a significant transition time to implement and proposed that the current accreditation authorities would continue to exercise the accreditation functions for a further five years (p. 127).

Second, in 2016 the Department of Education and Training commissioned Phillips KPA consultancy services to map professional course accreditation practices in Australian higher education. The Phillips KPA report *Professional Accreditation: Mapping the territory*<sup>4</sup> does not make formal recommendations but identifies some possible improvements to accreditation across the higher education sector. While the scope of the report is broader than accreditation in the National Scheme, the report makes some comments on the National Scheme and individual accreditation authorities and its suggested improvements encompass the work of accreditation authorities.

In late February 2018, the Department of Education and Training (DET) released a consultation paper on the Higher Education Standards Panel's (the Panel) advice on the impact of professional accreditation in Australian higher education and opportunities to reduce the regulatory burden on higher education providers, drawing on the Phillips KPA report. The Panel has recommended that:

- the Government consider a legislated code of practice that limits professional accreditation bodies to matters that are profession-specific, rather than issues already assured by the Tertiary Education Quality and Standards Agency (TEQSA)
- TEQSA work with accrediting bodies to build their capacity to work more effectively and efficiently – by establishing formal guidance, participating in workshops, encouraging a focus on outcomes-based quality assurance, and promoting best practice regulation, and
- a stakeholder forum is held to discuss the future of professional work and ways to further streamline accreditation.

The Government has accepted the Panel's advice in principle, and the department is seeking stakeholder views on the advice and its implementation. The consultation period closed on 30 April 2018.

The ASR, the [Professional Accreditation: Mapping the territory](#) report and the Panel's advice involves a broad, systemic perspective on accreditation issues rather than a focus on the performance of individual accreditation authorities. As noted above, governments are currently considering these reports.

This EOI process is not intended to pre-empt the outcomes of the Government's consideration of these reports. In contrast, it is intended to obtain sufficient information on an authority's capacity to perform against the measures currently agreed across all other authorities assigned accreditation functions under the National Law. This information will be used to support decision-making by the Board about the

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<sup>4</sup> <https://docs.education.gov.au/documents/professional-accreditation-mapping-territory>.

assignment of accreditation functions for paramedicine. Any decision of the Board is subject to the outcome of Government's consideration of the ASR final report.

## Expressions of interest

EOIs are required to be assessed against these criteria:

### 1. The ability of the accreditation entity to undertake the functions required under the National Law

[The Quality framework for the accreditation function](#) (Quality Framework)<sup>5</sup> is the reference document against which National Boards and AHPRA measure and assess the work of accreditation authorities. Accreditation authorities provide six-monthly reports to National Boards on developments relevant to the domains of the Quality Framework.

EOIs must demonstrate how they intend to satisfactorily address or meet the elements in each of the domains of the quality framework. The domains are as follows:

#### Domain 1: Governance

##### Description

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

To satisfactorily address this requirement the accreditation authority must:

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

#### Domain 2: Independence

##### Description

The accreditation authority carries out its accreditation operations independently.

To satisfactorily address this requirement the accreditation authority must:

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

#### Domain 3: Operational management

##### Description

The accreditation authority effectively manages its resources to carry out its accreditation function.

To satisfactorily address this requirement the accreditation authority must:

- manage its human and financial resources to achieve objectives in relation to its accreditation function

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<sup>5</sup> <http://www.ahpra.gov.au/Education/Accreditation-Authorities.aspx#quality>.

- have effective systems for monitoring and improving the authority's accreditation processes, and identify and manage risk
- be able to operate efficiently and effectively nationally
- have robust systems for managing information and contemporaneous records, including ensuring confidentiality, and
- in setting its fee structures, balance the requirements of the principles of the National Law and efficient business processes.

#### **Domain 4: Accreditation standards**

##### **Description**

The accreditation authority develops accreditation standards for the assessment of programs of study and education providers for approval by the Board.

The first requirement for an accreditation authority assigned paramedicine accreditation functions by the Board will be to develop, consult on and submit for approval by the Board, accreditation standards for the profession and plan their implementation. These standards must meet relevant Australian and international benchmarks, be based on available research and evidence, involve stakeholders in their development, be subject to wide-ranging consultation, be subject to regular review and take into account AHPRA's *Procedures for the development of accreditation standards and the National Law*.

As part of demonstrating how the entity intends to satisfactorily address or meet the elements of this domain, EOIs must include a costed outline of a project plan or proposal to undertake the priority activity outlined in the paragraph above.

#### **Domain 5: Processes for accreditation of programs of study and education providers**

##### **Description**

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

To satisfactorily address this requirement the accreditation authority must:

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

#### **Domain 6: Assessing authorities in other countries**

##### **Description**

Where the accreditation authority exercises this function, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries. This is not a required element and is outside the scope of this EOI.

## **Domain 7: Assessing overseas qualified practitioners**

### **Description**

Where the accreditation authority exercises this function, the authority must have processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law, and those whose qualifications are not approved qualifications under the National Law for the profession.

To satisfactorily address this requirement the accreditation authority must:

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

## **Domain 8: Stakeholder collaboration**

### **Description**

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

To satisfactorily address this requirement the accreditation authority must:

- have processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, National Boards and consumers/community
- have a communications strategy, including a website providing information about the accreditation authority's roles, functions and procedures
- collaborate with other national and international accreditation organisations, and
- collaborate with accreditation authorities for the other registered health professions appointed under the National Law via the health Professions Accreditation Collaborative Forum and joint projects conducted through the forum.

## **2. Collaboration and cost-effectiveness**

Collaboration, consistency and effective progress on cross-cutting issues has emerged as a theme in accreditation under the National Law and was an important theme in the ASR.

Cross-cutting issues relevant to the scheme include how accreditation can best:

- contribute to improving Aboriginal and Torres Strait Islander health
- support inter-professional education and practice
- contribute to addressing current and future health priorities such as safe use of medicines and family and domestic violence
- encourage innovation in learning environments
- strengthen risk-based approaches, and
- explore opportunities for collaboration to reduce duplication and improve effectiveness and efficiency.

EOIs are not required to demonstrate how the entity intends to address or meet all of these issues satisfactorily, but they are included to provide context about the accreditation function.

To support the Board's decision making on whether or not to assign accreditation functions externally it will be beneficial for respondents to provide an indication on what would be an appropriate annualised three year budget for the Board to allocate to this potential outsourcing of accreditation functions

Key required activities that may impact on work planning and budget setting in the first three years include:

- the development, consultation on and submission for approval of accreditation standards for paramedicine in the first ten months of starting the accreditation function, and
- assessment of up to 14 programs in two years of National Board approval of the accreditation standards.

### 3. Timeline for implementation

EOIs should also include a prospective time frame for the start of operations for performing the paramedicine accreditation function and subsequent dates for the sentinel activities highlighted in the budgeting assumptions noted above.

#### Timetable

Key timelines for this process are indicated below. These dates are advised as a guide only to projected timelines. The National Board and AHPRA will try to maintain this schedule, but reserves the right to vary dates.

Date EOI released - 1 June 2018
Closing date for EOI - 9 July 2018, by 5:00pm, Australian Eastern Standard Time
Review of submissions - 20 July 2018
Notification of outcome – before 13 October 2018

#### Evaluation

Each EOI will be assessed against the criteria below.

<b>Evaluation criteria</b>
1. Overall ability to undertake the functions
2. Ability to meet the governance requirements of the Quality Framework
3. Ability to meet the independence requirements of the quality framework
4. Ability to meet the operational management requirements of the Quality Framework
5. Ability to develop and implement accreditation requirements of the Quality Framework
6. Project plan or proposal to develop and implement accreditation standards for the profession
7. Ability to develop and implement processes for accreditation of paramedicine programs of study that meet the requirements of the Quality Framework
8. Ability to develop and implement processes for the assessment of overseas qualified practitioners that meet the requirements of the Quality Framework
9. Ability to meet the stakeholder collaboration requirements of the Quality Framework
10. Ability to collaborate and support cross-profession consistency across the National Scheme
11. Cost-effectiveness and value for money in the budgets and workplans provided
12. Ability to meet the time frames to complete expected activities in the first three years

EOIs will be evaluated against the criteria listed above, and scored using the following scale.

<b>Evaluation</b>	<b>Score</b>
Exceeds all aspects of the evaluation criterion	4
Exceeds some aspects of evaluation criterion (and meets all other aspects of the evaluation criterion)	3
Meets the selection criterion	2
Fails some aspects of the selection criterion	1

Fails all aspects of the selection criterion.	0
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If the Board decides that the accreditation function of the paramedicine profession is to be exercised by an external accreditation entity, shortlisted entities as a result of this EOI process may be invited to participate in a selective Request for Proposal (RFP) process.

All submissions in the RFP process will be advised of the final outcome of the evaluation process.

## Further information

If you have any questions or queries, please don't hesitate to contact the Board's Executive Officer Paul Fisher directly on 03 8708 9047 or by email ([paul.fisher@ahpra.gov.au](mailto:paul.fisher@ahpra.gov.au))