

# Consultation paper

Delegation of accreditation decision making from AMC Directors to Accreditation Standing Committees and consequential changes to AMC accreditation procedures



## Overview

This consultation seeks feedback on a proposed governance change within the AMC to delegate accreditation decision making from AMC Directors to AMC Accreditation Standing Committees, and the consequential changes to AMC accreditation procedures documents.

The Accreditation Standing Committees are: the Medical School Accreditation Committee; the Prevocational Standards Accreditation Committee; and the Specialist Education Accreditation Committee.

The delegation of accreditation decision making from AMC Directors to AMC accreditation standing committees relates to the AMC accreditation processes of the following:

- Primary medical programs
- Prevocational training accreditation authorities
- Specialist medical programs
- Workplace based assessment (WBA) providers
- Pre-employment Structured Clinical Interview (PESCI) providers.

The following AMC accreditation procedures documents are affected:

1. *Procedures for Assessment and Accreditation of Medical Schools by the Australian Medical Council*
2. *Procedures for assessing and accrediting prevocational training accreditation authorities*
3. *Procedures for Assessment and Accreditation of Specialist Medical Programs by the Australian Medical Council*
4. *Australian Medical Council Accreditation of Workplace Based Assessment Providers: Standards and Procedures*
5. *Pre-employment Structured Clinical Interview (PESCI) Guidelines and Criteria for AMC Accreditation of PESCI Providers* [joint document with the Medical Board of Australia – the AMC is only consulting on the change to its governance process and not to the individual criteria].



## Rationale for changes

There have been a number of drivers for AMC Directors to review options for the delegation of accreditation decision making:

- The AMC undertakes regular reviews of its governance arrangements and updates its constitution as needed to ensure that it continues to maintain good governance processes, in line with Domain 1 of the Australian Health Practitioner Regulation Agency's (Ahpra) *Quality Framework for the Accreditation Function*, which is the principal reference document for national boards and Ahpra to assess the work of accreditation authorities.

- The AMC also evaluates learning from the accreditation processes it undertakes and has identified a theme relating to streamlining and clarifying decision making in governance structures. In working with specialist medical colleges and the National Health Practitioner Ombudsman on the Ombudsman’s review of college accreditation processes, the AMC has considered its own processes in light of the good practice principles set out by the Ombudsman in her recent report.

AMC Directors considered that the delegation of accreditation decision making to AMC Accreditation Standing Committees would better ensure that decisions are made by the representative groups that have conducted the detailed review of the provider/authority/programs of study against the accreditation standards. The Standing Committees are responsible for the detailed review and analysis of AMC teams’ accreditation reports, and providers’/authorities’ material change requests and monitoring submissions. These Committees have the appropriate membership/representation to undertake this work. It is therefore appropriate for the decision making relating to this work to rest with the Standing Committees. Accreditation decision making would be faster with fewer steps in the decision-making process.

The right of reply e.g. the ability of the provider/authority to comment on the draft accreditation assessment report would remain.

Any internal review of AMC accreditation decisions would continue to be undertaken by the AMC Directors who would no longer be the original decisionmakers.

From 2023, the National Health Practitioner Ombudsman has an expanded role, including receiving complaints about accreditation organisations undertaking accreditation functions under the National Law. This includes complaints about the AMC’s processes, and is an additional avenue for review beyond the AMC procedures.

The AMC works with the Medical Council of New Zealand to implement binational accreditation processes for medical schools and specialist medical colleges. These processes are not affected by this change and the Medical Council of New Zealand would continue to make independent accreditation decisions based on these processes.



## Summary of changes to AMC accreditation decision making

As noted in the Overview section, the delegation of accreditation decision making from AMC Directors to AMC Accreditation Standing Committees relates to AMC accreditation of the following:

- Primary medical programs
- Prevocational training accreditation authorities
- Specialist medical programs
- Workplace based assessment (WBA) providers
- Pre-employment Structured Clinical Interview (PESCI) providers.

Currently AMC Directors make all accreditation decisions (including setting and adjusting conditions on accreditation) on the recommendation of AMC Accreditation Standing Committees.

Under the proposed governance change, this accreditation decision making would be delegated to the Accreditation Standing Committees, and would cover decisions on:

- initial accreditation
- accreditation
- reaccreditation
- revocation of accreditation
- material changes to providers/authorities and programs
- changes to the accreditation status of providers/authorities and programs (via monitoring or assessment activities).

Accreditation decisions include the timeframe of accreditation and may also include the placing of conditions on the accreditation.

AMC Directors would maintain responsibility for the following:

- approval of accreditation standards and accreditation procedures
- internal review of an accreditation decision
- decide on the constitution of an accreditation team where the provider/authority and committee disagree on perceived or actual conflicts of interest
- all accreditation decisions for newer accreditation processes i.e. accreditation of programs of study for endorsement of registration and of CPD homes.

The AMC's accreditation procedures describe how the accreditation process is managed in a fair and transparent manner, and the proposed changes to these documents ensure continued alignment with the requirements of the *Quality Framework for the Accreditation Function*, and the National Law. In particular, there is a clear reconsideration and review process, allowing a 'right of reply' by the provider/authority undergoing accreditation relating to an accreditation assessment report and/or accreditation decision.

While this consultation includes limited proposals to give effect to the proposed changes related to accreditation decision making, the AMC undertakes substantive reviews of its procedures from time to time. The review of standards for specialist medical programs may give rise to a more substantive review of the related procedures. The [AMC's strategic projects](#) relating to the international medical graduate assessment experience and performance, and on the future development of AMC assessments for international medical graduates may also give rise to proposals for more substantive changes to the standards and procedures for both Workplace based assessment and PESCI providers in the future.



## Consultation feedback

The AMC welcomes your feedback on the delegation of accreditation decision making from AMC Directors to AMC Accreditation Standing Committees, and the consequential changes to the relevant AMC accreditation procedures.

To facilitate responding, a small number of broad consultation questions are provided. Please complete the **Consultation Feedback Form** and email in **MS Word format** to [accreditation@amc.org.au](mailto:accreditation@amc.org.au) by **14 May 2024**.

The updated accreditation procedures documents are at:

**ATTACHMENT 1** - *Procedures for Assessment and Accreditation of Medical Schools by the Australian Medical Council*

**ATTACHMENT 2** - *Procedures for assessing and accrediting prevocational training accreditation authorities*

**ATTACHMENT 3** - *Procedures for Assessment and Accreditation of Specialist Medical Programs by the Australian Medical Council*

**ATTACHMENT 4** - *Australian Medical Council Accreditation of Workplace Based Assessment Providers: Standards and Procedures*

**ATTACHMENT 5** - *Pre-employment Structured Clinical Interview (PESCI) Guidelines and Criteria for AMC Accreditation of PESCI Providers [joint document with the Medical Board of Australia]*

**Note:** *The use of highlighting in the documents indicates that updates have been made to that section.*



## Consultation timeline and enquiries

Six weeks public consultation from 2 April 2024 to 14 May 2024.

For enquiries relating to this consultation, please email: [accreditation@amc.org.au](mailto:accreditation@amc.org.au).