



HEALTH
PROFESSIONS
ACCREDITATION
COLLABORATIVE
FORUM

Australia's accreditation authorities
for regulated health professionals

15 March 2023

Ms Robyn Kruk AO
Independent Reviewer
Health Practitioner Regulatory Settings

Vai email: HealthRegReview@finance.gov.au

Dear Ms Kruk

RE: Consultation Paper – Review of regulatory settings relating to registration and qualification recognition for overseas health practitioners

On behalf of Forum members, thank you for the opportunity to provide a submission to your review of regulatory settings relating to health practitioner registration and qualification recognition for overseas health professionals (the Review). Submission documents are enclosed.

Yours sincerely

Narelle Mills
Chair
Health Professions Accreditation Collaborative Forum

Enc:

- HPAC Forum Submission Coversheet 2023 03 15
- HPAC Review of regulatory settings relating to registration and qualification recognition of overseas health practitioners 2023 03 15

Review of regulatory settings relating to registration and qualification recognition for overseas health practitioners

The Health Professions Accreditation Collaborative Forum is the coalition of the 15 accreditation authorities in the National Registration and Accreditation Scheme (the Scheme) established under the Health Practitioner Regulation National Law Act 2009 (National Law) (as in force in each state and territory). In accordance with Section 6 of the National Law, a National Board may appoint an external entity to exercise the accreditation functions or establish a Committee of the Board. As at March 2023, there are five Committees, and 10 external entities accrediting health practitioner programs.

Assessment of overseas qualified practitioners may be exercised by an accreditation authority, or a National Board may choose to retain this function. Of the 15 accreditation authorities, the following undertake assessments of overseas qualified practitioners; Australian Dental Council, Australian Medical Council, Australian Pharmacy Council, Australian Physiotherapy Council, Occupational Therapy Council, Optometry Council Australian and New Zealand and the Council on Chiropractic Education Australia.

Discussion Question	HPAC response
<p>1. The review is considering recommendations to ease skills shortages in registered health professions including medicine, nursing, midwifery, psychology, pharmacy, occupational therapy and paramedicine on the basis of current and projected labour market shortages.</p>	<p>1a. Do you agree there are current and/or projected skills shortages in these professions?</p> <p>The Forum acknowledges the role of accreditation of health practitioner programs and assessment of overseas health practitioners contributes to a safe and flexible workforce to meet the needs of all Australians. We take the responsibility of ensuring the threshold of safe practice as our focus, with a continued regard for ensuring no unnecessary barriers are embedded in our processes to support the workforce.</p> <p>Forum members report that the shortage of practitioners in Australian community and health service settings is a topic of discussion in their committees/boards. Members also report that overseas colleagues report similar shortages.</p> <hr/> <p>1b. If yes, is there any data or evidence you can provide to demonstrate these shortages?</p> <p>Some professions have government developed workforce plans (Medicine and Nursing), while others do not. What is lacking is an integrated workforce plan which articulates the skills needed to ensure high quality care for Australians now and into the future. The removal of a national health work workforce body for all professions has contributed to increasing uncertainty about what needs to be done, for which professions and by what time frame.</p>
<p>2. What, in your view, are the key strengths and weaknesses of the current regulatory settings relating to health practitioner registration and qualification recognition for overseas-trained health practitioners?</p>	<p>The National Law is flexible in design and application. A title-based Scheme focussed on patient/public safety enables flexibility of scope of practice within training and qualifications.</p> <p>The complexity for applicants comes with the navigation of the multiple agencies undertaking different components of the end-to-end process. Accreditation authorities have the skills, experience and understanding of assessment strategies and are well placed to undertake the assessment of overseas qualified practitioner processes. The standard for assessment of overseas</p>

trained practitioners should align with clear standards for the relevant stage of education and training in Australia, which are developed by Accreditation Authorities on behalf of their National Boards.

Accreditation authorities have strong links to their profession, and education providers, and education and assessment expertise in their professions. They draw on this network to ensure that their assessments are educationally well designed, at the appropriate standard, and in line with international standards for assessment in the profession.

A current complexity is the variation across the regulated professions in assignment of responsibility for overseas trained practitioner assessment to an external Accreditation Authority or through an internal accreditation committee in the case of the Nursing and Midwifery Board, or directly through the National Boards.

3. During the pandemic, a range of regulatory settings and processes relating to registration and qualification recognition of overseas-trained health practitioners were temporarily waived, relaxed or had greater flexibility.

3a. Are there settings or processes that were particularly beneficial or challenging from a professional or employer perspective?

Forum members undertaking assessments of overseas qualified practitioners during the pandemic did not lower the assessment standard but did consider and where appropriate implement, changes to assessment processes (e.g. introducing candidate support teams or moving elements of the assessment process online). The National Scheme entities worked together well during the pandemic, to ensure that processes continued to be available, sometimes with greater flexibility than is usually possible. Accreditation authorities shared ideas and challenges, and National Boards and Accreditation Authorities collaborated well.

3b. Do you believe any of these temporary changes

were beneficial or potentially detrimental to patient safety?

3c. What opportunities/challenges may arise if these settings and/or processes are retained permanently?

Because processes have evolved and changed rapidly, there needs to be opportunity for evaluation of the changes. Further innovation may be possible as a result of that evaluation.

4. The end-to-end process for overseas health practitioners seeking to work in Australia can be complex, time-consuming and costly. Current regulatory requirements may set unduly restrictive barriers, which in turn may deter potential practitioners from seeking to work in Australia.

4a. Do you agree with this premise? If so, why?

These processes are complex given the multiple agencies involved from immigration through to registration and employment. IT is not always clear, even to the accreditation authorities undertaking the assessments, where accurate information on other stages of the process can be sourced.

Forum members undertaking assessments of overseas qualified practitioner assessments have worked hard to ensure the assessment component of the 'end to end' process seeking to register in Australia are streamlined, supported and set at the threshold needed for public safety. This threshold is underpinned by the standards expected of a day one graduate of an accredited health practitioner program in Australia and approved by the relevant National Board.

4b. What practical changes could be made to current regulatory settings to most significantly improve the end-to-end process:

Where the assessments of overseas qualified practitioner assessment processes are undertaken by the National Board, assign this function to accreditation authority for that profession, including assessment of substantial equivalence and competent authority.

i. Over the next 12 months

Increasing the number of examination sittings, a seemingly effective strategy to process more applicants, comes with identified risks. More questions need to be drafted to avoid leakage of items and topics. Developing more items is also

ii. [In the medium-to-longer-term?](#)

costly and time consuming., especially when these assessment items are clinical activities. It would be more effective and cheaper to examine more candidate per sitting where possible

5. If you are an overseas health practitioner or employer – are there any thoughts you would like to share in terms of your experience of the end-to-end process for working in Australia or employing an overseas-trained health practitioner?