

The Higher Education Standards Panel's advice on the impacts of professional accreditation in higher education

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Senator the Hon Simon Birmingham
Minister for Education and Training
Parliament House
Canberra ACT 2600

Dear Minister

I write to convey the advice of the Higher Education Standards Panel (the Panel) on professional accreditation requirements in higher education, including options to reduce the burden on providers, as requested in your letter of appointment of February 2016.

The Panel has given substantial consideration to this matter over the course of 2016 and 2017. To inform this work, the Department of Education and Training commissioned PhillipsKPA consultants to map the scale and scope of professional accreditation activity in the Australian higher education sector. The Panel has considered the PhillipsKPA report, *Professional Accreditation – Mapping the territory* in forming its advice.

The report paints a generally positive picture of professional accreditation activity, with strong support particularly at operational levels within universities. This contrasts with the generally negative anecdotal feedback Panel members have been alert to in recent years, particularly from vice-chancellors and other senior managers concerned about the impact on institution resources, autonomy and innovation.

However, the report assessed that, whilst there are perceived benefits from this activity for both providers and the professions, the regulatory and financial burden of professional accreditation is significant. It concludes that accreditation processes could be more efficient and less labour intensive, with a need for less duplication of activity already undertaken by the Tertiary Education Quality and Standards Agency (TEQSA) through its assessment and assurance of compliance with the Higher Education Standards Framework. The report also includes a number of suggestions for action, while noting that these were not formally part of the brief for the consultancy.

The Panel sought confirmation of these findings by circulating a final draft to all university vice-chancellors. They largely endorsed the report findings, while identifying some additional concerns that the report authors reflected in the final version. The Panel thanks you for agreeing to publication of the report in August 2017. It is an original piece of work that adds significantly to the sector's knowledge and understanding of its regulatory environment. I note the report was published on the department's website on 4 September 2017.

The Panel's advice has also been informed by work undertaken, to date, on an independent review of accreditation systems within the National Registration and Accreditation Scheme (NRAS) for health professions, commissioned by the Australian Health Ministers' Advisory Council. This review, conducted by former Productivity Commissioner

Professor Michael Woods, is currently nearing completion, following the release of a draft report on 4 September 2017.

The draft review report recommends a model for integrated governance of accreditation for the regulated health professions which incorporates significant new elements that align closely to the Panel's vision for professional accreditation activity – that is, to more clearly delineate areas of responsibility between TEQSA and professional bodies and, where possible, to remove any duplication of assurance assessment. We understand that, while there is apparently some concern in the health professions about aspects of the proposed governance model itself, the proposed streamlining of accreditation processes has generally been welcomed.

Throughout our deliberations, the Panel's vision has been for a system of professional accreditation that adds value to higher education delivery and outcomes, that is delivered effectively and efficiently without duplication of, or overlap with, the regulatory oversight responsibilities of TEQSA.

In practice, this means that assessments of higher education courses by professional accreditation bodies should focus exclusively on matters that are profession-specific; and accept that academic accreditation under the TEQSA Act provides appropriate assurance of quality for matters covered by the Higher Education Standards Framework. This should be the case regardless of whether such assurance has been delivered by TEQSA itself or through a self-accrediting provider's own internal quality assurance processes (which are, in turn, assured by TEQSA, through its periodic review of registration).

Following consideration of a range of options to reduce the regulatory burden of professional accreditation, the Panel makes the following recommendations.

Recommendation 1

The Panel recommends that the Government consider requiring professional accreditation bodies to only assess or raise matters that are profession-specific and not already assured by accreditation against the Higher Education Standards Framework under the TEQSA Act, whether that accreditation is undertaken by TEQSA or by a self-accrediting provider.

The Panel considers there are, broadly, four mechanisms available to achieve this:

- a. Legislate to prevent professional bodies from assessing matters already assured against the Higher Education Standards Framework, with penalties for non-compliance.
- b. Develop a legislated code of practice, in the form of a disallowable instrument.
- c. Develop a voluntary code of practice, endorsed by Government.
- d. Allow the sector to self-regulate.

On balance, the Panel recommends the adoption of a legislated code of practice (option b), to give some teeth to the preferred approach; with the code to be developed in consultation with professional accreditation stakeholders, including institutions, professional associations and their representative bodies. In the Panel's view, a voluntary code of practice or self-regulation is unlikely to compel sufficient change in approach by professional accreditation bodies. On the other hand,

preventing assessment of matters assured by TEQSA through legislated restrictions would be too blunt and heavy-handed.

Recommendation 2

The Panel recommends that TEQSA's expertise be leveraged to help build capacity within professional bodies to undertake professional accreditation in the most efficient manner through promotion of outcomes focused, risk-informed and context aware assessment policies and practices. Engagement with and participation in such capacity building activities should be incorporated into the code of practice proposed at recommendation 1.

A program of potential capacity building activities could be developed through the Government:

- jointly tasking TEQSA and the department to assess the range of capacity building activities that could be developed and managed within current responsibilities and resources, and potentially
- providing one-off funding for TEQSA to develop formal training based capacity building activities, to be delivered subsequently on a fee for service basis.

Recommendation 3

The Panel recommends that the Government task the Department of Education and Training to work with the Panel to convene a forum of relevant stakeholders to discuss the future of professional work with a view to identifying opportunities that may exist to develop a more streamlined model of professional accreditation that would be more relevant to the future of both the higher education sector and the professions.

I enclose a report on the Panel's consideration of professional accreditation which includes a detailed discussion of the basis for these recommendations. It includes a table outlining how the recommendations address or align with the actions suggested in the PhillipsKPA report.

I would be happy to discuss these matters at your convenience, should you wish to do so.

Warm regards



Professor Peter Shergold AC

Chair, Higher Education Standards Panel

On behalf of Emeritus Professor Alan Robson AO CitWA, Professor Greg Craven AO, Ms Karen Thomas, the Hon Phil Honeywood, Dr Krystal Evans, Professor Ian O'Connor AC (observer) and the Rev Dr Don Owers AM (observer)

15 December 2017

Encl. "Professional accreditation requirements in Australian higher education
Consideration by the Higher Education Standards Panel"

Professional accreditation requirements in Australian higher education

Consideration by the Higher Education Standards Panel

In February 2016 the Minister for Education and Training requested the Higher Education Standards Panel's advice on the impact of professional accreditation in Australian higher education and opportunities to reduce the regulatory burden on higher education providers.

Throughout its deliberations, the Panel's vision has been for a system of professional accreditation that adds value to higher education delivery and outcomes, that is delivered effectively and efficiently without duplication of, or overlap with, the regulatory oversight responsibilities of the Tertiary Education Quality and Standards Agency (TEQSA).

In practice, this means that assessments of higher education courses by professional accreditation bodies should focus exclusively on matters that are profession-specific; and accept that academic accreditation under the *Tertiary Education Quality and Standards Agency Act 2011* (the TEQSA Act) provides appropriate assurance of quality for matters covered by the Higher Education Standards Framework. This should be the case regardless of whether such assurance has been assured by TEQSA itself or through a self-accrediting provider's own internal quality assurance processes (which are, in turn, assured by TEQSA, through its periodic review of registration).

To inform its advice, the Panel has considered work already being undertaken in this field, consulted with key stakeholders on areas of shared interest and asked the Department of Education and Training (the department) to commission PhillipsKPA consultants to map the scale and scope of professional accreditation activity in the Australian higher education sector.

PhillipsKPA report, *Professional Accreditation – Mapping the territory*

The final PhillipsKPA report, *Professional Accreditation – Mapping the Territory* was published on the department's website on 4 September 2017. The report was prepared drawing on an extensive literature review as well as consultation with the sector, including university representatives, other education providers and professional accreditation bodies.

The report identifies approximately 100 agencies that undertake formal accreditation on behalf of the professions. In most cases accrediting bodies are independent self-regulating corporate entities, including industry associations and private bodies; along with some government agencies (for example in education) and some as collectives of such entities.

The report captures both the nature of the activity and the range of issues of concern identified by stakeholders.

- Problems cited by providers include the regulatory and financial burden, the wide variation in format and type of information required, perceived inappropriate attempts to intervene in institutional autonomy by professional bodies, lack of transparency and due process and poorly prepared accreditation panels.
 - 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.
 - An example of this is the imposition of minimum English language requirements for entry to accredited programs which exceed those required by the provider for

admission to the degree. The Panel supports a consistent approach to English language requirements in line with those applied by the Department of Immigration and Border Protection for student visas.

- Problems cited by professional bodies include that small professions sometimes have difficulty providing assessors or reviewers who do not appear to have a conflict of interest, submissions by institutions that are perceived as “sales pitches” and providers that use external accreditation consultants to prepare accreditation documentation, and thus do not get much value out of accreditation.
- The financial burden of accreditation is significant, especially for providers that have a high proportion of technical and health profession 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 for 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.
- Accreditation agencies claim that they subsidise the process from other income sources or at least only recover their costs. No agency admits to making a profit from accreditation, yet it continues to be a financial imposition on both sides.

The report paints a generally positive picture of professional accreditation activity, with strong support particularly at operational levels within universities. However, the report assessed that, whilst there are perceived benefits from this activity for both providers and the professions, the regulatory and financial burden of professional accreditation is significant.

The report includes a number of suggestions for action, while noting that these were not formally part of the brief for the consultancy. The suggestions are:

- development of a nationally agreed code of practice along the lines of the *Joint Statement of Principles for Professional Accreditation* released by Universities Australia and Professions Australia in 2016
- development of a ‘plain English’ guide to accreditation responsibilities, to help delineate accreditation responsibilities to ensure less duplication of activity already undertaken by TEQSA
- provide support for improved sharing of resources
- provide support for a project to accelerate the development and adoption of risk-based approaches
- provide support for a project to develop online reporting capability.

A summary of how the Panel’s recommendations (outlined below) address or relate to PhillipsKPA’s suggestions is provided at [Attachment A](#).

Universities Australia and Professions Australia *Joint Statement of Principles for Professional Accreditation*

Universities Australia (UA) and Professions Australia (PA) released the *Joint Statement of Principles for Professional Accreditation* (Joint Statement) on 9 March 2016.

The Joint Statement is well regarded by the sector and is designed to ensure that professional accreditation processes operate in a transparent, accountable, efficient, effective and fair way. It has not been formally endorsed by the sector as it does not currently have broad coverage of either providers or of professional bodies.

The Panel held discussions with representatives from UA and PA about the Joint Statement. UA noted feedback from its members suggests that the Joint Statement has assisted in easing regulatory burden for providers. PA noted that while the Joint Statement is non-binding, there is strong encouragement for all PA members to adhere to the principles.

PA noted that it is working with non-university providers to develop a set of agreed principles in line with the Joint Statement, which will provide greater coverage of the higher education sector. PA is also developing best practice documents to support the Joint Statement, which may improve their promulgation and help to clarify the distinction between TEQSA's regulatory role and that of professional accreditation.

Accreditation Systems Review for the regulated health professions

An independent review of accreditation systems within the National Registration and Accreditation Scheme (NRAS) for health professions, commissioned by the Australian Health Ministers' Advisory Council (AHMAC), is currently being conducted by Professor Michael Woods. The Panel met with Professor Woods where it was agreed that there are clear areas of shared interest in both the Panel's and the Review's deliberations.

The draft report of the Review, released on 4 September 2017, outlines possible reform options to streamline accreditation processes and enhance governance structures within NRAS. The draft report recommends a model for integrated governance of accreditation for health professions, which includes as a key feature, a clear delineation of responsibilities for academic accreditation and for professional accreditation.

If adopted, this delineation would be enabled by amendments to the National Law which governs the health professions accreditation system. This will provide the opportunity to make a significant impact on the burden of accreditation processes in the health professions, underpinned by nationally consistent legislation.

This approach aligns closely with the Panel's goal that professional accreditation assessments be limited to matters that are profession-specific rather than issues already assured by TEQSA.

Options for professional accreditation reform

The Panel examined a range of options for reducing the regulatory burden of professional accreditation on higher education providers and concluded that action is required in two key areas.

Delineation of responsibilities between academic and professional accreditation

The Panel considers the optimal approach would be to ensure that professional accreditation bodies only assess matters that are profession-specific. This could be achieved by accrediting bodies being encouraged or required to accept that TEQSA's registration and regulatory oversight of compliance with the Higher Education Standards Framework (HESF) provides adequate assurance in the defined set of areas covered by the HESF.

Limiting the remit of professional bodies to areas of professional competence or practice that are outside matters covered by the HESF would likely result in some bodies not needing to undertake any additional assessment activities, and others significantly reducing their assessment requirements. This would result in a considerable reduction in duplicative efforts for providers in compiling and supplying the same or similar information for multiple accreditation processes and in reducing the costs of constantly updating information and making staff available for numerous site visits.

Outside of the health professions, there is currently no legislative framework available to achieve this outcome for the wider professional accreditation sector. The Panel considers a range of possible mechanisms is available to pursue a clearer delineation of accreditation responsibilities.

- a. Legislate under the TEQSA Act, to prevent professional bodies considering any matter covered by the HESF as a part of their accreditation processes, with penalties attached for non-compliance.
 - A transition period would be required to deliver consensus on what matters, if any, remained in scope for professional bodies to assure.
 - For professions where all education matters are covered by the HESF, institutions could still potentially seek professional body 'endorsement' or 'approval' of courses on a voluntary basis.
 - This option could be viewed as heavy-handed, imposing penalties on accreditation bodies that are generally motivated by positive intentions, and may therefore meet with significant resistance from the professional accreditation sector.
 - If adopted, any such regulatory change would need to be carefully designed to ensure it has full coverage of accreditation bodies and agencies as well as to avoid unintended consequences, given the power of professional bodies to deny entry to professions.
- b. Development of a legislated code of practice enabled by the TEQSA Act. This could take the form of a disallowable instrument, providing the authority of legislation.
 - The code could be based on the UA/PA Joint Statement.
 - The Joint Statement would need to be reinforced to more explicitly express the need for delineation of responsibilities between academic and professional accreditation.
 - Development of a code of practice would best be achieved in consultation with relevant stakeholders.
 - Adoption of such a code under a legislative instrument would provide coverage across the whole sector, not just the members of UA and PA as is currently the case with the Joint Statement.
 - This might be viewed as a fairer, more co-operative approach than option a, and would assist professional bodies to further develop their standards and approaches to accreditation to be more effective, efficient and consistent across the entire sector.
- c. Development of a voluntary code of practice, endorsed and promoted by the Commonwealth through the Minister for Education and Training, the Department of Education of Training and TEQSA.
 - Again, such a code could be based on the current UA/PA Joint Statement, strengthened in relation to delineation of accreditation responsibilities and broadened to encompass the entire sector.
 - This mechanism would not have the authority of a legislative approach.
- d. Allow the sector to self-regulate, without any government intervention.
 - This would rely on the further development of the UA/PA Joint Statement, to provide greater coverage of higher education providers and professional bodies – the timeframe to achieve this may be significant.
 - The Panel welcomes the intent and the approach of UA and PA in developing the Joint Statement and acknowledges that its ongoing development could encourage further reform of the professional accreditation sector.

A voluntary code of practice or self-regulation (options c and d) are unlikely to compel sufficient change in the approach taken by professional accreditation bodies. The Panel is therefore predisposed to a legislative response – this would not only be more consistent with the recommended reforms to accreditation in the health professions, but would also have a more positive impact on regulatory burden for higher education providers in a shorter time frame.

In the Panel's view, preventing assessment of matters assured by TEQSA through legislated restrictions (option a) would be too blunt and heavy-handed. The Panel therefore considers the adoption of a legislated code of practice (option b) would be the best approach. Consideration would also need to be given to an effective dispute resolution protocol, commensurate with adopting a code of practice through a legislative instrument.

In addition, the Panel supports and encourages the further development of the UA/PA Joint Statement as this work could underpin the proposed legislative option.

Building the capacity of professional bodies

The PhillipsKPA report clearly identifies the significant variation in the capacity for, and the approach to, accreditation activities undertaken by professional bodies. There are some bodies highlighted as example of good practice because of their focus on quality improvement and transparent outcomes. Whilst others, often smaller, independent bodies with fewer resources, are deficient in their recognition of modern trends and in their approach to due process.

The Panel believes there is a need to develop a strategy to build the capacity of those professional bodies with lower levels of experience in best practice regarding accreditation processes. Such bodies would benefit from a range of opportunities, such as:

- improved awareness of, and training in, good practice in quality assurance and assessment, including adopting an outcomes approach to assessments rather than an inputs approach
- being better informed of TEQSA's role and what matters are assessed under the HESF
- establishing stronger links with TEQSA, noting that TEQSA has MOUs with some professional bodies and a new MOU with PA, but resources to support additional MOUs are limited
- developing relationships with other professional bodies, with a view to working more collaboratively on elements of accreditation that may be common to certain professions (it is noted that 50 per cent of bodies do not belong to a group of peers such as PA or the Australian Health Professions Accreditation Councils Forum).

Such capacity building activities could encourage more streamlined approaches to accreditation assessments, improve understanding by professional bodies of the requirements for registration and accreditation against the HESF, improve transparency and due process of accreditation activities and improve the quality of accreditation panels.

- These changes would go a long way towards improving the quality and consistency of the accreditation process, thereby reducing the burden imposed on providers.
- The Panel favours integrating participation in capacity building activities by professional bodies with the recommended legislative code of practice outlined earlier.

TEQSA has indicated it is interested and in a position, subject to resources, to develop a range of capacity building activities. Some work has been done to identify a number of potential capacity building activities which fall into one of two main categories:

- activities that could be developed and managed within current responsibilities and resources, including:
 - work with PA and other professional associations on joint briefing events designed to promote good practice and the avoidance of duplication and to build collaborative relationships
 - work with peak bodies in the non-university sector to advance good practices and promote the avoidance of duplication in accreditation activities
 - TEQSA could work with professional associations to develop lists of experts held in common, who could provide evidence for both TEQSA and professional accreditation activities, building common expertise in the application of professional standards within the context of the HESF
 - TEQSA could produce a guidance note on the place of professional accreditation within the HESF and with advice on good practice in the use of existing assessment practices
 - TEQSA could review current MOUs and ensure any new MOUs with professional bodies include a commitment to shared and less burdensome forms of regulation.
- activities that would require additional resourcing to develop, with a view to potentially being delivered by TEQSA (on a fee for service basis) including:
 - development and delivery of workshops for professional bodies and individual assessors on areas such as the role of TEQSA, regulating against standards, risk-based and evidence-based regulation
 - TEQSA has already developed and presented customised workshops for a few industry professional bodies around the role of TEQSA and risk based regulation
 - potential for an online training module to be developed on assessment and course accreditation, which could be based on TEQSA's Case Management Handbook
 - the mapping of a professional body's industry standards against the HESF and the required evidence statements which would potentially need to be negotiated and agreed between TEQSA and the industry professional body.
 - such mapping, while potentially resource-intensive, could go some way to reassuring professional accreditation bodies that input and process issues at an institutional level are accredited by TEQSA, thus freeing up professional accreditation to concentrate on profession specific outcomes.

The Panel notes that providing training on a fee for service basis was originally a part of TEQSA's remit.

The Panel is also keen to explore the possibility of a broader discussion with relevant stakeholders about the ongoing need for such a diverse range of profession-specific accreditation. This could potentially take the form of a forum or conference bringing accreditation bodies, higher education providers and relevant peak representative bodies together to discuss and examine issues such as:

- in the context of rapid technological advances, is each profession really so different from the next and what is it about each profession that will continue to need specific oversight by a professional body?
- how might cognitive technologies such as artificial intelligence narrow the differences between professions and/or professional accreditation requirements? (e.g. will professional work become more generic with the use of such technologies?)
- what do these changes mean for the delivery of profession-based higher education?
- could a new model of accreditation be developed which is underpinned by a more generic approach to professional accreditation?

The ideal outcome of such a convention would be to identify: what is common to all professions (aside from accreditation requirements under the HESF) that could form the basis for common or generic standards for the accreditation of profession-based higher education courses; agreement on how such a baseline accreditation process might be delivered most efficiently; and what profession-based courses would still require additional accreditation by the relevant professional body, for example in the health professions.

Other options for reform

The Panel considered other options for reducing the burden of professional accreditation, that are presented here for completeness.

- Develop effective information sharing protocols to leverage TEQSA assessment information.
 - This would potentially reduce regulatory burden by providing an effective way for professional bodies to use information already held by TEQSA so that education providers do not have to provide duplicate information.
 - Given the clear preference by the Panel to pursue delineation of accreditation responsibilities, the need for a comprehensive information sharing protocol is considered unnecessary. However, it is noted that TEQSA has MOUs with 18 professional associations as well as one with PA which provide for the sharing of information. Resources to support additional MOUs are limited.
- Encourage joint accreditation assessments.
 - Providers and accrediting bodies could be encouraged to jointly assess for accreditation processes where possible. TEQSA's renewal of registration and renewal of course accreditation dates are clearly set out on the National Register.
 - Accrediting bodies could be asked to keep their accreditation timeframes aligned with TEQSA's where possible or to actively seek to undertake joint assessments with other accrediting bodies the provider needs to deal with.
 - Anecdotal information suggests that, despite interest in joint assessments from some accrediting bodies, university faculties have not been interested in this approach. The suspicion is that they view the accreditation processes as assisting them in their internal resourcing processes and course design. That attitude could limit the effectiveness of this option.
 - Given this uncertainty, the Panel does not support this option, but notes that there may be opportunities through the further development of the UA/PA Joint Principles and the MOUs between TEQSA and some accrediting bodies for a joint approach to assessment to evolve.
- A requirement for accrediting bodies to be registered by Government.
 - It would be difficult, resource intensive and most likely contentious to enforce a requirement for accrediting bodies to be registered by government.
 - The option for government to develop a registration system could potentially be used to encourage reform, however the Panel does not support an indirect approach of this kind.

The Panel's recommendations

Recommendation 1

The Panel recommends that the Government consider requiring professional accreditation bodies to only assess or raise matters that are profession-specific and not already assured by accreditation against the Higher Education Standards Framework under the TEQSA Act, whether that accreditation is undertaken by TEQSA or by a self-accrediting provider.

The Panel considers there are, broadly, four mechanisms available to achieve this:

- a. Legislate to prevent professional bodies from assessing matters already assured against the Higher Education Standards Framework, with penalties for non-compliance.
- b. Develop a legislated code of practice, in the form of a disallowable instrument.
- c. Develop a voluntary code of practice, endorsed by Government.
- d. Allow the sector to self-regulate.

On balance, the Panel recommends the adoption of a legislated code of practice (option b), to give some teeth to the preferred approach; with the code to be developed in consultation with professional accreditation stakeholders, including institutions, professional associations and their representative bodies. In the Panel's view, a voluntary code of practice or self-regulation is unlikely to compel sufficient change in approach by professional accreditation bodies. On the other hand, preventing assessment of matters assured by TEQSA through legislated restrictions would be too blunt and heavy-handed.

Recommendation 2

The Panel recommends that TEQSA's expertise be leveraged to help build capacity within professional bodies to undertake professional accreditation in the most efficient manner through promotion of outcomes focused, risk-informed and context aware assessment policies and practices. Engagement with and participation in such capacity building activities should be incorporated into the code of practice proposed at recommendation 1.

A program of potential capacity building activities could be developed through the Government:

- jointly tasking TEQSA and the department to assess the range of activities that could be developed and managed within current responsibilities and resources, and potentially
- providing one-off funding for TEQSA to develop formal training based capacity building activities, to be delivered subsequently on a fee for service basis.

Recommendation 3

The Panel also recommends that the Government task the Department of Education and Training to work with the Panel to convene a forum of relevant stakeholders to discuss the future of professional work with a view to identifying opportunities that may exist to develop a more streamlined model of professional accreditation that would be more relevant to the future of both the higher education sector and the professions.

Suggestions included in the PhillipsKPA report

The table below outlines the suggestions included in the PhillipsKPA report and details how the Panel's consideration of professional accreditation and its recommendations to reduce the burden on higher education providers could address these suggestions.

Suggestion in report	Issue addressed by suggestion	The Panel's response to suggestions
<p>Development of a nationally agreed code for good practice principles and practices for accreditation promulgated as an "ideal model" for all accreditation agencies.</p> <ul style="list-style-type: none"> Professions Australia/Universities Australia <i>Joint Statement of Principles for Professional Accreditation</i> should form the basis of such a code. Could be used as a reference point for mediation of intractable disputes over process by a designated body (perhaps TEQSA). 	<p>Improving consistency among accrediting agencies.</p> <ul style="list-style-type: none"> Inconsistencies in the approach to accreditation by professional bodies have arisen as processes and policies have been developed in isolation. Improved consistency will reduce the burden and cost on providers – eg not having to provide the same information in different formats etc. 	<p>The Panel has recommended a legislative response to the issue of delineating responsibility of academic accreditation through the TEQSA Act and professional accreditation undertaken by professional bodies.</p> <ul style="list-style-type: none"> The options are to exclude consideration by professional bodies of matters related to the Higher Education Standards Framework (HESF) or to develop a code of practice as a legislative instrument. <p>Whilst the recommendation is stronger than the PhillipsKPA suggestion, the Panel believes there is still a role for the further development of the UA/PA Joint Statement to underpin the recommended legislative options.</p>
<p>Development of a 'plain English' guide to accreditation responsibilities, perhaps in the form of a table.</p> <ul style="list-style-type: none"> 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. 	<p>Reduction in duplication caused by professional bodies seeking information related to TEQSA's regulatory role.</p>	<p>The Panel strongly supports and recommends the separation of TEQSA's role and that of professional accrediting bodies to limit the need for duplication of common information collection.</p> <p>The Panel also recommends that TEQSA could, subject to resources, support capacity building in accrediting bodies. This could include developing reference materials, such as Guidance Notes or a 'plain English guide', which could underpin the recommended legislative options to delineate accreditation responsibilities.</p>
<p>Provide support for improved sharing of resources</p> <ul style="list-style-type: none"> TEQSA engagement activities have been important for briefing professional bodies on 	<p>Improve the consistency, efficiency and effectiveness of professional bodies,</p>	<p>The Panel's recommendation for delineating accreditation responsibilities would alleviate the need for common collection of information relating to assessment</p>

Suggestion in report	Issue addressed by suggestion	The Panel's response to suggestions
<p>current approaches to regulation and accreditation.</p> <ul style="list-style-type: none"> Support could be provided to further coordinate and promulgate such collaboration. <p>Provide support for a project to accelerate the development and adoption of risk-based approaches.</p> <ul style="list-style-type: none"> Develop a mechanism for professional bodies to access information held by TEQSA 	<p>particularly smaller bodies that may lack the resources to lift their performance.</p> <p>Further development of 'right touch' monitoring of higher risk programs and providers.</p> <p>Increased collaboration among accreditation agencies, higher education providers and TEQSA would be beneficial.</p>	<p>of providers against the HESF. A comprehensive information sharing infrastructure would therefore be unnecessary.</p> <p>However, there is a need for the sharing of knowledge and experience to build the capacity of some professional bodies, as recommended by the Panel.</p> <p>TEQSA has expressed interest in delivering training courses as an area of additional work, subject to resourcing. This could include promoting current approaches to regulation and accreditation as good or assisting adoption of risk-based approaches to assessment.</p>
<p>Provide support for a project to develop universal online reporting capability.</p> <ul style="list-style-type: none"> 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. 	<p>Reduction in duplication, improvement in consistency.</p> <p>Could incorporate a "core set" of information, including common data sets and agreed consistent terminology</p>	<p>The Panel has not recommended the development of technology solutions to better support the professional accreditation process, as more direct options are favoured.</p> <p>Whilst an online tool for accrediting bodies use alone might improve the efficiency of their reporting for accreditation purposes, this is not a role for the Commonwealth.</p>