



# Accreditation Procedures for Podiatry Programs for Australia and New Zealand

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# 1. Accreditation Procedures

## 1.1 Introduction

Under the *Health Practitioner Regulation National Law Act* as in force in each Australian State and Territory (the National Law), the Australian and New Zealand Podiatry Accreditation Council (ANZPAC) may grant accreditation if it is reasonably satisfied that a program of study, and the education provider that provides it, meet approved accreditation standards. It may also grant accreditation if it is reasonably satisfied the provider and program of study substantially meet an approved accreditation standard, and the imposition of conditions on the approval will ensure the program meets the standard within a reasonable time. Having made a decision, ANZPAC reports its accreditation decision to the Podiatry Board of Australia (the Board) and/or the Podiatrists Board of New Zealand (PBNZ) when appropriate to enable both Boards to make a decision on the approval of the program of study for registration purposes.

In setting accreditation standards and awarding accreditation status, ANZPAC is also cognisant of the New Zealand *Health Practitioners Competence Assurance Act 2003* that provides a framework for the regulation of health practitioners in order to protect the public where there is a risk of harm from professional practice.

To facilitate accreditation of courses, ANZPAC has established an Accreditation Committee to make recommendations to the ANZPAC Board of Directors on matters concerning the accreditation of entry and graduate level podiatry programs of study. The Accreditation Committee consists of registration board representatives, members of the ANZPAC Board of Directors, academics, a registered podiatric practitioner and a community representative.

An Assessment Team is appointed and trained as required (consisting of four people including an academic from an Australasian education provider, a member of the ANZPAC Board of Directors, a registered podiatrist and a professional body representative). The Assessment Team conducts the accreditation and submits a report to the Accreditation Committee, who in turn submits its recommendations to the ANZPAC Board of Directors. The ANZPAC Board of Directors ultimately determines the result of the accreditation process for a program of study.

## 1.2 Types of Accreditation

There are three types of accreditation status relevant to podiatry programs of study

- **Accreditation of existing programs of study** – the review and accreditation of existing programs of study every five years if no major changes occur
- **Major changes** – the review of major changes to an accredited podiatry program
- **New programs** – the review of a new program of study

A summary of the processes, responsibilities and timelines prior to course commencement or timeframe for accreditation is indicated below.

Activity	Responsibility	Timeline
Initial assessment for new programs or existing programs of study - In accordance with <i>Accreditation Status of Australian and New Zealand Programs of Study</i>	Education Provider/ANZPAC	24 months prior
Documentation negotiation for accreditation - ANZPAC advises education provider of documentation required - Negotiation occurs regarding timelines, site visit dates	Education Provider/ANZPAC	18 months prior
Self Evaluation Report (SER) completion - Provides comprehensive self-evaluation of how the course meets accreditation standards	Education Provider	12 months prior
Assessment Team Appointment/Review of SER - Assessment team appointment - Notification to education provider - Conflict of interest notification opportunity (if needed by education provider) - Assessment team reviews SER - As required, education provider asked to provide additional information with sufficient time allowed for the education provider to provide this information back to the team (generally 2 – 4 weeks) - Initial site visit (if required to confirm or provide additional information regarding facilities and other aspects and providing opportunity for response to SER) - Initial report recommendations: <ul style="list-style-type: none"> <li>o Satisfactory report: proceed to formal site visit</li> <li>o Unsatisfactory report: SER format aspects/additional information required</li> <li>o Unsatisfactory content: Education provider not ready for formal inspection, deficiencies outlined and recommendations made</li> </ul>	Accreditation Committee/Assessment Team	12 months prior
Formal Site Visit and Reporting - Assessment team spends 1-3 days on campus studying all aspects of the program including: - Facilities inspection, staff/management interviews, financial/corporate records, student credentials/grading/promotion/graduation records - Assessment team may offer suggestions for improvement - Exit interview with education provider/Head of Program regarding initial findings - First draft report to be provided within 2 months of site visit	Assessment Team	6 - 12 months prior

Activity	Responsibility	Timeline
Formal Site Visit and Reporting (continued) <ul style="list-style-type: none"> <li>- Education provider/Head of Program receives report and forwards amended version (corrected for factual errors) to Assessment Team leader</li> <li>- Assessment Team completes report and indicates recommendations and reasons</li> </ul>		
Report Finalisation and Recommendations <ul style="list-style-type: none"> <li>- Assessment team report distributed to Accreditation Committee</li> <li>- Accreditation Committee finalises report and makes a recommendation to ANZPAC Board of Directors</li> <li>- Report sent to education provider seeking review and written response</li> <li>- Education provider provides response to ANZPAC</li> </ul>	Accreditation Committee	6 months prior
Outcome of Accreditation <ul style="list-style-type: none"> <li>- Accreditation determined according to options available</li> </ul>	Accreditation Committee/Board of Directors	3 months prior
Notification of Outcome <ul style="list-style-type: none"> <li>- Determination of accreditation notified to education provider and Podiatry Board of Australia</li> <li>- Review available in accordance with Appeals Policy</li> </ul>	ANZPAC	3 months prior
Ongoing Monitoring <ul style="list-style-type: none"> <li>- Annual report on each program of study</li> </ul>	ANZPAC	Annually

## **2. Accreditation of Existing Programs of Study**

For the accreditation of existing programs of study, the education provider is required to submit a completed Self Evaluation Report (SER) to ANZPAC. The SER provides details of the full program and of the financial, physical and staff resources available to design and implement all years of the program and to support the program when fully established. The education provider's documentation must be submitted sufficiently in advance of the re-accreditation timeline (usually 12 months) to allow the education provider time to respond to any requirements of ANZPAC.

### ***Options for accreditation of existing programs of study***

#### **Accreditation for five years**

Accreditation for five years is granted when the podiatry program of study meets the standards. This applies if there are no major changes to the program during the period of accreditation granted and no significant reduction of resources available to the program. The education provider is obliged to notify ANZPAC if it plans any major change to its podiatry program of study or if resources of the program have been significantly reduced.

#### **Accreditation for five years with conditions**

Accreditation with conditions will be granted when one or more standards are not fully met provided the education provider is capable of rectifying any shortcomings within a specified period. The education provider is required to notify ANZPAC when these shortcomings have been rectified.

ANZPAC reserves the right to revisit an education provider granted accreditation subject to conditions. In the event of the required progress not being achieved, accreditation may be limited to a shorter period of time or revoked.

#### **Accreditation for shorter periods with conditions**

If major deficiencies are identified, ANZPAC may grant accreditation with conditions for a period of less than five years. At the conclusion of this period, or sooner if the education provider considers that it has addressed the deficiencies, ANZPAC will conduct a review. This may take the form of a full assessment of the program with a view to granting accreditation for a further five years or a limited review concentrating on the areas where deficiencies were identified with a view to extending the current accreditation to five years.

#### **Accreditation refused**

Accreditation will be refused when there are significant deficiencies and ANZPAC judges, on the advice of its Accreditation Committee, that the education provider does not have the capacity to remedy them or does not accept the need to do so. In accordance with the National Law, if ANZPAC decides to refuse to accredit a program of study it must give written notice of the decision to the education provider that provides the program. The notice will state the reasons for the decision and that, within 30 days after receiving the notice, the education provider may apply to ANZPAC for an internal review of the decision. The notice must also state how the education provider may apply for an internal review.

### **3. Accreditation of Major Changes**

#### ***Definition of a major change***

ANZPAC requires an education provider to lodge in writing notification of changes to an accredited program of study.

ANZPAC defines a major change as:

*“Substantive matters that will affect the policy or practices of an education provider and that could impact upon the delivery of a program of study, including modification, alteration, addition, amendment, substitution or deletion of any aspect of the program or education provider, that causes the changes to the substance, structure, form, delivery or outcomes of the program such that students are completing a program of study that is different to the program that was accredited.”*

ANZPAC should be consulted if there is doubt as to whether a proposed change may constitute a major change. Education providers contemplating such changes are required to consult ANZPAC at least 12 months prior to any changes being introduced. ANZPAC must also be kept informed of significant steps in the change process. Failure to do so may result in insufficient time for ANZPAC to assess the program changes resulting in a change of accreditation status.

Changes to an accredited program considered to be a major change are detailed in Table 1.

#### ***Assessment of proposed major changes***

The education provider is required to submit an outline of actual or proposed changes to the program of study at least 12 months prior to any change being introduced. The submission should specify what impact these changes will have on the ability of the program of study to continue to meet the accreditation standards. The submission should also address the capacity of the education provider to manage the change process, including any students completing the currently accredited program of study.

The assessment of the impact of the changes will be undertaken by the Accreditation Committee in consultation with the Assessment Team Leader who led the most recent accreditation to review the submission, conduct a site visit if necessary and provide advice either that the changes:

- Comply with the standards and the education provider has demonstrated the capacity to manage the change process
- Does not comply with the standards and/or the education provider has not demonstrated a capacity to manage the change process

### ***Options for accreditation of major changes***

- Accreditation of modified program for the remainder of the current period of accreditation
- Accreditation of the modified program until completed by one cohort of graduates. Before expiry of the current period of accreditation, a date for re-accreditation of the whole program will be negotiated
- Accreditation of modified program, with conditions until completed by one cohort of graduates
- Accreditation refused

Accreditation will be refused when there are significant deficiencies and the ANZPAC Board of Directors judges, on the advice of the Accreditation Committee, that the education provider does not have the capacity to remedy them or does not accept the need to do so.

In accordance with the National Law, if ANZPAC decided to refuse to accredit a program of study it must give written notice of the decision to the school that provides the program. The notice will state the reasons for the decision and that, within 30 days after receiving the notice, the school may apply to ANZPAC for an internal review of the decision. The notice must also state how the school may apply for an internal review.

**Table 1: Modifications considered a major program change**

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- Merger with another entity
  - Contracting with another body to deliver a significant proportion of a course or services
  - Significant organisational changes such as those which have a major impact on governance, quality assurance and staffing (such as restructuring of academic governance arrangements, or changes involving senior academic or administrative staff)
  - A decline in financial position
  - Changes to delivery location by moving to a new site, adding an additional site (including any offshore sites) or withdrawing from an existing site
  - Changes to the mode of delivery of a course, such as from face-to-face to distance education or online
  - Increase or decrease in duration of a program
  - Changes to course entry requirements
  - A substantive change in enrolments numbers
  - Changes to learning outcomes for a course, or core subjects within the course
  - Changes to core subjects within a course
  - Changes to course structure, such as to the proportion of core to elective subjects
  - Changes to elective subjects, including addition, substitution or deletion of subjects in a course, where such changes affect more than 25% of the total number of subjects in the course, measured over the duration of the course accreditation period
  - Change to the composition of staffing such as substitution of full time staff by sessional staff, or change in academic level of teaching staff
  - Major alterations to teaching premises
  - A reduction or increase in student contact hours in a course
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## 4. Accreditation of New Programs of Study

Education providers seeking accreditation of a new podiatry program of study are required to provide notification to ANZPAC not less than 24 months prior to the intended course commencement, such that criteria for accreditation and guidelines for program approval can be provided as the program is undergoing construction.

ANZPAC will not comment on the desirability or otherwise of a new podiatry program except to the extent that it has a legitimate concern for the overall standards of podiatric education. Education providers contemplating the establishment of a podiatry program of study need to conduct independent negotiations with the appropriate authorities. Education providers issuing media releases or publishing material regarding proposed new programs of study should seek approval from ANZPAC for any statements regarding ANZPAC and the accreditation process.

New programs of study are assessed against the same standards as established programs with these programs required to complete and submit a SER in the first instance. ANZPAC through the Accreditation Committee appoints an assessment team to undertake review of the SER. This involves consideration of an overview of the podiatry program plans and the resources available to support all years of the program, without examination of the detail of the curriculum. The purpose of this review is to determine whether the education provider's SER is sufficiently well developed to proceed with the accreditation process and to establish if the broad curriculum plan is likely to comply with the standards. The SER should include the following:

### *Governance Context*

- Governance, administration and appointment processes for key positions of responsibility and overall links to institutional governance structure and funding
- Evidence of support from appropriate authorities concerning student places, financial aspects and clinical facilities
- Details of complicating factors including links with other institutions or authorities and strategies to address potential issues
- Mission and objectives including information on curriculum philosophy and relationship to program

### *Students*

- Students including selection, program promotion and progression

### *Curriculum and Assessment*

- Program overview and major program components with sufficient detail to indicate if plans are likely to comply with accreditation standards, also highlighting unique or special features and strengths of the proposed program
- Program curriculum including curriculum planning process to date and progress, together with basic outline of program goals and objectives
- Teaching –research nexus including current situation and plans to build research profile
- Assessment of students including overall policy and any details

### *Educational Resources*

- Academic staff and clinical teachers and key appointment made or intended, staff development strategy and support for professional development of clinical teachers
- Educational resources including buildings, clinical sites, library, Information and Communication Technologies facilities
- Financial, physical, human and clinical resources overview for all years of the program

### *Program Evaluation*

- Program evaluation and details of evaluation policy

## **Options for accreditation of new programs of study**

### ***Accreditation with conditions***

Accreditation with conditions is granted after a satisfactory initial assessment. The primary condition is in place until after the first cohort of students completes the program. Other conditions may also apply on the direction of ANZPAC. Accreditation with conditions will be subject to satisfactory annual written reports relating to the operation and evaluation of these changes. ANZPAC will monitor the implementation of the program to ensure the education provider continues to meet the accreditation with conditions standards. When the first cohort of students is in its final year, the education provider will be required to submit a comprehensive progress report. Subject to a satisfactory report, ANZPAC will begin the accreditation process to assess the course as for an existing program of study.

### ***Unsatisfactory progress procedures***

In the event that ANZPAC finds that the required progress on the conditions is not being achieved or is unlikely to be achieved, ANZPAC may:

- Place further conditions on the accreditation and specify actions to be taken or issues to be addressed by the education provider; or
- Revoke accreditation from the education provider if it considers that the education provider is unable to deliver the program at a standard or in a manner compatible with the accreditation standards

### ***Accreditation is not granted***

Accreditation of the new program may be refused where the education provider has not satisfied ANZPAC that the complete program can be implemented and delivered at a level consistent with the standards. ANZPAC will advise the education provider on the deficiencies to be addressed before it will reconsider reaccreditation.

In accordance with the National Law, if ANZPAC decided to refuse to accredit a program of study it must give written notice of the decision to the education provider that provides the program. The notice will state the reasons for the decision and that, within 30 days after receiving the notice, the education provider may apply to ANZPAC for an internal review of the decision. The notice must also state how the education provider may apply for an internal review.

## **5. Suspension or Closure Podiatry Programs of Study**

In the event that an education provider decides to suspend or cease provision of education leading to the award of a recognised qualification in podiatry, the education provider should advise ANZPAC as soon as practicable of the decision. Arrangements will need to be agreed for monitoring the provision of the accredited course to remaining cohorts of students.

## **6. Annual Reporting Requirements**

### ***Annual reports***

Under section 50 of the National Law, ANZPAC is required to monitor programs of study to ensure that they continue to satisfy the program and that the education provider meets the approved accreditation standards.

All schools, whether accredited with or without conditions, must submit an annual report to ANZPAC. For programs with no conditions, this may take the form of the University Departmental Report. Programs that have been accredited with conditions must report annually on progress towards meeting the requirements of the condition/s. In the case of an education provider conducting a new program, the annual report must provide detailed comments on the final arrangements in the later years of the program including the success of the first year of the program and details of the preparation for the final years of the program.

### ***Procedures following consideration of annual reports***

The Accreditation Committee that reports to the ANZPAC Board of Directors considers the annual reports. If the Committee considers any reported changes in a program or any reduction in the resources available to the school are likely to have a significant effect on the standards, or if it considers that an education provider's progress in meeting any conditions of its accreditation to be unsatisfactory, it will inform the education provider of its concerns and the grounds on which they are based and request a site visit.

If the site visit report is favourable, ANZPAC may confirm the accreditation of the program for a specified period subject to satisfactory annual reports. If the report is unfavourable, ANZPAC may:

- Place conditions on the accreditation status granted and/or restrict the period of accreditation
- Revoke accreditation for the program if it considers that the education provider is unable to deliver the program at a standard or in a manner compatible with the standards.