




# Monitoring Policy

**Owner:** AOAC  
**Revision:** 1  
**Date of Issue:** 19 July 2021

<b>Name of the Policy</b>	Monitoring Policy
<b>Policy Number</b>	
<b>Description of Policy</b>	This policy describes the principles surrounding quality assurance and monitoring of osteopathy programs accredited by AOAC and approved by the OsteoBA.
<b>Category</b>	Accreditation
<b>Audience</b>	This policy applies to all education providers of accredited osteopathy programs in Australia
<b>Status</b>	New Policy
<b>Last Revised</b>	25 June 2021
<b>Next Review</b>	25 June 2024

<b>Endorsed by</b>	AOAC Board	Date:
<b>Responsible Officer</b>	Chair of the Accreditation Committee	
<b>Author</b>	Professional Officer	
<b>Approved by</b>	Dr Gopi McLeod PhD AOAC Board Chair	Date: 19 July 2021
<b>Signed</b>		

<b>Related Documents</b>	
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# Key definitions

Definitions that relate to sections with numbers are references within the *Health Practitioner Regulation National Law Act (2009) (National Law)*.

**Accreditation expiry date** – the date the program ceases to be accredited for the purpose of enrolling new students. Accreditation expiry dates are stipulated by AOAC and are based on when the program is published on the Osteopathy Board of Australia’s Approved Program of Study list.

**Accreditation standard**, for a health profession, means a standard used to assess whether a program of study, and the education provider that provides the program of study, provide persons who complete the program with the knowledge, skills, and professional attributes necessary to practise the profession in Australia.

**Approved accreditation standard** – under the National Law is an accreditation standard –

- a. Approved by a National Board under section 47(3); and
- b. Published on the Board’s website under section 47(6).

**Accredited program of study** – means a program of study accredited under National Law section 48 by an accreditation authority.

**Ad-hoc monitoring** – a form of targeted monitoring that is applied to investigate an immediate concern relating to a program, education provider or group of programs.

**Approved program of study** – under the National Law is for a health profession or for endorsement of registration in a health profession, means an accredited program of study -

- a. Approved under Section 49(1) by the National Board established for the health profession; and
- b. Included in the list published by the National Agency under Section 49(5).

**Education provider** means –

- a. a university; or
- a. a tertiary education institution, or another institution or organisation, that provides vocational training; or
- b. a specialist medical college or other health profession college.

**Health Practitioner Regulation National Law Act 2009** an Act providing for the adoption of a national law to establish a national registration and accreditation scheme for health practitioners. (Often referred to as the National Law)

**Monitoring** – As described in Section 50 of the National Law, AOAC monitors programs of study approved by the OsteoBA to ensure the program and education provider continue to meet the approved accreditation standards. This consists of routine, targeted and ad-hoc monitoring methods.

**Program Changes** – change to any part of the approved program of study, including program structure, curriculum, or resources. Changes are classified into groups, those that must be reported to AOAC immediately, prospectively and those that can be reported retrospectively.

**Program Monitoring Report (PMR)** – is completed annually for the accreditation period by the education provider and confirms that the program continues to meet the relevant accreditation standards.

**PMR risk assessment** – is a tool completed by the education provider to risk assess retrospectively program changes as part of the PMR.

**Routine monitoring** – annual monitoring that is undertaken for all programs, including those in teach-out period. Routine monitoring includes completion of the PMR and updating the PMR risk assessment.

**Teach-out period** – describes the timeframe allocated to an ‘expiring/expired accredited program’ for current students to complete the program they initially enrolled in.

**Targeted monitoring** – addresses a specific concern relating to a program or an education provider. It includes the submission of specified program information, written reports and additional site visits.

## 1. Purpose

The purpose of this policy is to ensure the Australian Osteopathic Accreditation Council (AOAC) monitors osteopathy programs that are accredited by AOAC in accordance Section 48(1) of *Health Practitioner Regulation National Law Act 2009* (National Law) and approved by the Osteopathy Board of Australia, as an approved program of study in accordance with Section 49(1) of the National Law.

## 2. Scope

This policy applies to all AOAC accredited osteopathy programs and education providers.

## 3. Policy statement

AOAC must monitor approved programs of study and the education provider that provides the program to ensure the program and provider meet an approved accreditation standard for the osteopathy profession in accordance with Section 50 of the National Law (2009).

If AOAC reasonably believes the program of study and education provider no longer meet the approved accreditation standard for osteopathy, AOAC must –

- a. decide to
  - i. impose the conditions on the accreditation that the accreditation authority considers necessary to ensure the program of study will meet the standard within a reasonable time; or
  - ii. revoke the accreditation of the program of study; and
- b. give the Osteopathy Board of Australia that approved the accredited program of written notice of the accreditation authority's decision.

## 4. Principles

Under the National Law, AOAC's responsibility extends to ensuring programs and education providers continue to meet relevant accreditation standards across the accreditation period. To fulfil this function AOAC has in place a variety of monitoring mechanisms.

AOAC undertakes routine, targeted and ad-hoc monitoring enabling ongoing quality assurance and continuous quality improvement of professional education and training to respond to evolving community need and professional practice.

AOAC supports innovation and works with education providers to ensure program changes continue to meet accreditation standards. While program changes are supported and encouraged to enable continuous quality improvement, education providers must report program changes to AOAC in accordance with this policy.

AOAC will manage monitoring activities and assessment of program changes in a transparent, fair and timely way.

### 4.1. Prospective notification of program changes

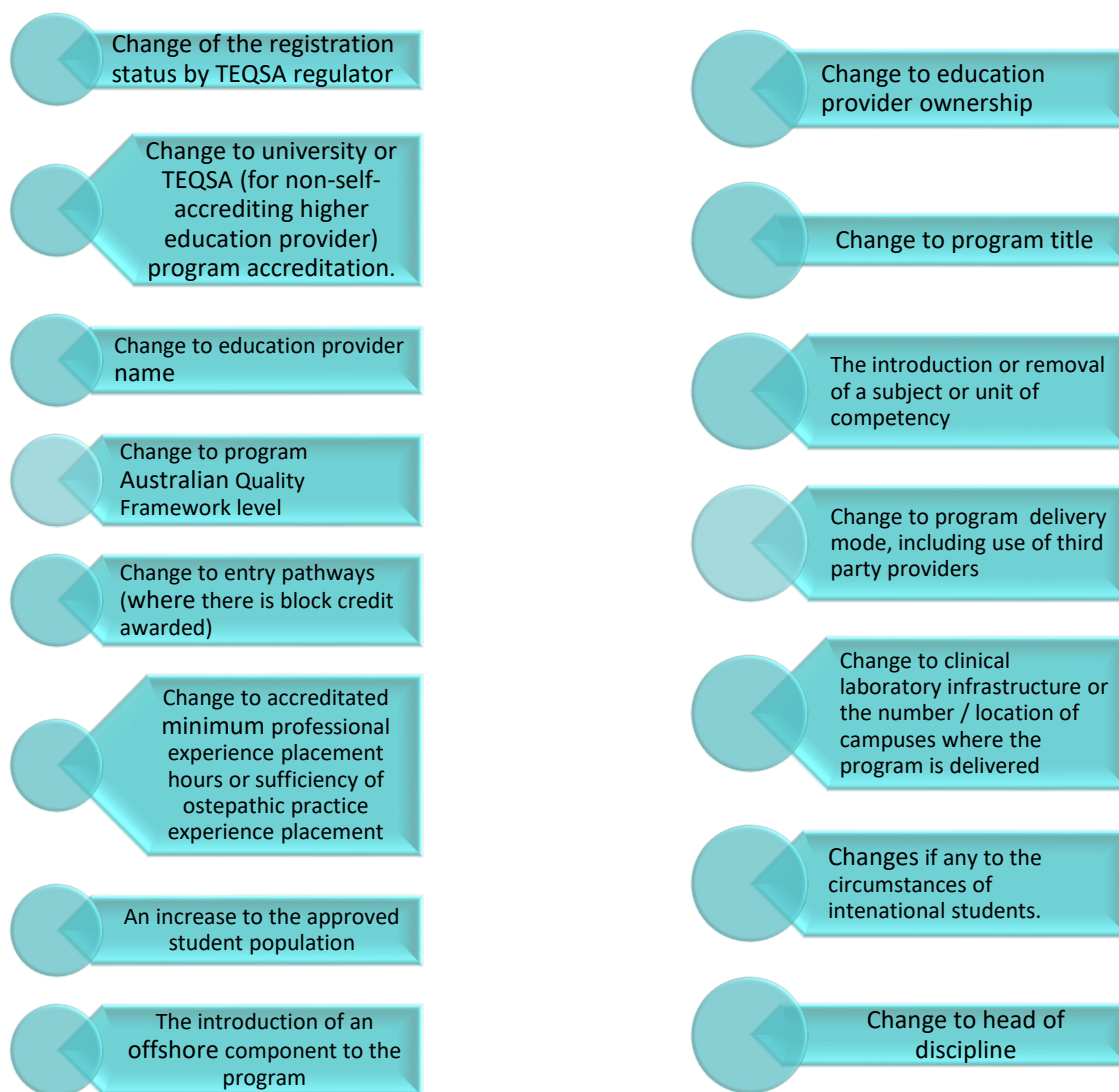
Selected program changes, as listed below, require education providers to prospectively (i.e., in advance) notify AOAC and seek approval prior to implementation: other changes are to be reported retrospectively in the program monitoring report (PMR). When prospectively notifying AOAC of program changes, the education provider needs to take into consideration the time required by AOAC to assess and approve the desired changes, which may take up to six months.

AOAC may require an education provider to report *all* program changes prospectively. The education provider will be formally notified when this is required.

AOAC is to be *immediately* notified by the education provider if Tertiary Education Quality and Standards Association (TEQSA), proposes or commences an investigation, implementation of conditions or change to the accreditation status.

All education providers must prospectively notify AOAC of select program changes as listed in Figure 1:

**Figure 4: Prospective notification of select program changes.**



To report a prospective change, the education provider needs to electronically submit an Intention to Submit form or contact AOAC administration staff, via [admin@osteopathiccouncil.org.au](mailto:admin@osteopathiccouncil.org.au) for the information about the required documentation. Assessment of program changes may incur a fee.

## 4.2. Routine monitoring

Routine monitoring is undertaken through the Program Monitoring Report (PMR) and updating of the program's Risk Assessment Tool. These reports are completed annually on the anniversary date of the OsteoBA's approval of the program of study. The PMR is used by AOAC to determine whether the program and provider continue to meet the approved accreditation standard against which the program was accredited.

The PMR is also used to report all retrospective program changes relevant to criterion requirements in the related accreditation standards.

When an education provider does not submit a PMR, accreditation conditions may be imposed, or accreditation of the program may be revoked.

## 4.3. Targeted monitoring and accreditation conditions

AOAC determines an appropriate level of program monitoring by undertaking a risk assessment based on outcomes of program assessment.

AOAC will apply targeted monitoring:

- when assessment of evidence indicates a potential risk of criterion requirements not being met over time.
- to ensure criterion requirements are implemented within a designated timeframe.
- to mitigate potential risks.

AOAC will apply accreditation conditions:

- when assessment of evidence indicates criterion, requirements are only substantially met.
- to ensure outstanding criterion requirements are met within a reasonable timeframe.
- to minimise specific risks.

Targeted monitoring and accreditation conditions can be applied at any point in the accreditation cycle or when managing a complaint. Targeted monitoring can also be applied ad-hoc to address an immediate concern relating to a program or an education provider.

Where assessment outcomes do not indicate a need to instigate targeted monitoring or conditions, the program and education provider are assessed as being low risk. Table 1 provides guidance on the relationship between assessment outcomes, risk assessment and levels of monitoring.

NB: Applied levels of monitoring are at the discretion of AOAC.

**Table 1 Risk assessment and levels of monitoring**

ASSESSMENT OUTCOME	RISK	MONITORING
<ul style="list-style-type: none"> <li>Criteria met</li> </ul>	Low	<ul style="list-style-type: none"> <li>Routine annual monitoring</li> <li>Prospective notification of <i>selected</i> program changes</li> </ul>
<ul style="list-style-type: none"> <li>Criteria met AND</li> <li>Some criteria met with targeted monitoring applied.</li> </ul>	Medium	<ul style="list-style-type: none"> <li>Routine annual monitoring</li> <li>History of noncompliance with a failure to respond to information from accreditation reports.</li> <li>Targeted monitoring requiring submission of evidence over a designated timeframe</li> <li>Prospective notification of <i>selected</i> program changes</li> <li>May include prospective notification of <i>all</i> program changes</li> </ul>
<ul style="list-style-type: none"> <li>Criteria met AND</li> <li>Criteria substantially met with targeted monitoring applied. AND/OR</li> <li>Criteria substantially met with conditions applied</li> </ul>	High	<ul style="list-style-type: none"> <li>Routine annual monitoring</li> <li>Targeted monitoring requiring submission of evidence over a designated timeframe</li> <li>Conditions requiring submission of evidence by a designated timeframe.</li> <li>Prospective notification of <i>all</i> program changes</li> </ul>

#### 4.4. Ad-hoc monitoring

Ad-hoc monitoring is applied as needed when immediate and specific concerns relating to a program, education provider or group of programs is identified.

**Evidence requirements:** Targeted monitoring and accreditation conditions require the education provider to submit supporting evidence, information and/or written reports to demonstrate specific criterion requirements are met.

AOAC can apply ad-hoc monitoring at any time to address immediate concerns relating to the program or an education provider. Additional site visits may also be required to support evidence gathering.

AOAC will formally notify education providers about intended monitoring processes, including application of. Or change to. Monitoring requirements or accreditation conditions.

#### 4.5. Roles and Responsibilities

The Accreditation Committee has overall responsibilities for ensuring that AOAC monitors approved programs of study to ensure AOAC continues to be satisfied the program and the provider meet an approved accreditation standard.

#### 4.6. Training

The AOAC Board is responsible for implementing and ensuring compliance with this policy through creation and maintenance of effective training and procedures and process consistent with the Accreditation Policy and Procedures.