



Internal Review of Accreditation Decisions Policy

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Policy Control

Document title	Internal Review of Accreditation Decisions Policy.
Description	The Australian Osteopathic Accreditation Council (AOAC) is required by section 48(4) of the <i>Health Practitioner Regulation National Law</i> to have a process for internal review of certain accreditation decisions.
Category	Accreditation.
Scope	This policy applies to education providers who have applied for accreditation of an osteopathic education program.
Related documents	<i>AOAC Accreditation Policy and Procedure;</i> <i>AOAC Conflict of Interest Policy;</i> <i>Australian Osteopathic Accreditation Council's Osteopathic Accreditation Standards (2021);</i> <i>Health Practitioner Regulation National Law Act 2009 (NSW) (National Law);</i> <i>Quality Framework for the Accreditation Function 2018.</i>
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Signature

Role	Name	Signature	Date
Chair, Board of Directors	Wendy Cross		8.11.2024

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1. Definitions

Accreditation	The process of assessing educational programs of study and the education providers that provide those programs against relevant Osteopathy Board of Australia (OsteoBA) approved accreditation standards to ensure that the provider and program provide graduates with the relevant knowledge, skills and professional attributes to competently practice the profession.
Education provider	An organisational entity responsible for the design and delivery of a program of study from which graduates are eligible to apply for registration with or endorsement by the OsteoBA.
Education provider	<ul style="list-style-type: none">▪ A university; or▪ a Tertiary Education Quality and Standards Agency (TEQSA) approved higher education provider, or▪ a specialist medical college or other health profession college.
Internal Review Committee (IRC)	<ul style="list-style-type: none">▪ The IRC comprises of three members, convened to review an accreditation decision.▪ The committee members have:<ul style="list-style-type: none">○ the required experience and expertise○ no prior involvement in the assessment or accreditation decision being reviewed○ no conflicts of interest relating to the matter
Program of study	A program of study provided by an education provider leading to eligibility to apply for registration or endorsement by the OsteoBA.

2. Purpose

- 2.1. In accordance with Section 48(4) of the Health Practitioner Regulation National Law Act (National Law), the Australian Osteopathic Accreditation Council (AOAC) is required to have an internal review process in place to undertake a review of accreditation decisions.
- 2.2. An education provider may apply for an internal review after a decision is made by the AOAC to:
 - a. refuse to accredit a program of study, or
 - b. revoke the accreditation of a program of study.

3. Scope

This policy applies to education providers who have been refused accreditation of a program of study or who have had accreditation of osteopathic education revoked by AOAC.

4. Policy Statement

AOAC must, in accordance with section 48 of the National Law, conduct an internal review of an accreditation decision to refuse or revoke accreditation if an education provider lodges a written appeal within 30 days of receiving notice of the final AOAC decision.

5. Timeline

The timeline for an internal review will vary depending on the complexities of each case, the quality of the evidence and the responsiveness of the education provider. Figure 1, below, outlines the internal review process.

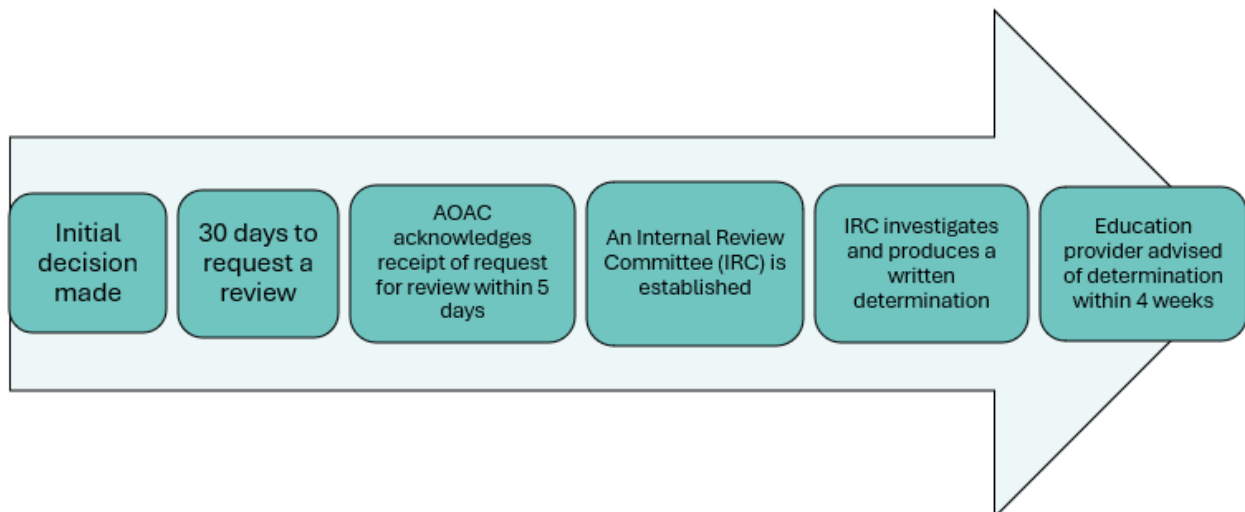


Figure 1: The Internal Review process.

6. Principles

6.1. Reasons for Seeking an Internal Review

An education provider may apply for an internal review if AOAC has refused to accredit a program of study, or has revoked accreditation of a program of study, and the education provider considers that at least one of the following circumstances apply:

- a. the accreditation decision was not made in accordance with AOAC's Osteopathic Accreditation Standards,
- b. the accreditation decision was not made in accordance with AOAC policy and procedure documents,
- c. there was an error of fact when assessing the accreditation submission,

- d. the final accreditation decision, and reasons for decision, do not substantially reflect the evidence provided by the education provider.

6.2. Applying for an Internal Review

- 6.2.1. An education provider must apply in writing to the AOAC Executive Officer (EO) for an internal review of a decision to refuse accreditation or revoke accreditation within 30 business days of receiving notice of the decision from AOAC. Applications received after this date will not be considered.
- 6.2.2. The request for an internal review must include:
 - a. Identification of at least one reason under 6.1(a) accompanied by a clear justification for the internal review; and,
 - b. relevant material to support the application for a review.
- 6.2.3. The AOAC Executive Officer (EO) will acknowledge receipt of the request in writing for internal review within five business days of receiving the request.
- 6.2.4. In submitting an application for an internal review, an education provider must demonstrate to the satisfaction of the IRC that the decision to refuse or revoke accreditation was incorrect. Until such time, the final accreditation decision shall remain valid and unchanged.

6.3. Establishment of an Internal Review Committee (IRC)

- 6.3.1. The AOAC EO will establish an IRC within 14 days of receiving an application for internal review that meets the requirements outlined in section 6 of this document.
- 6.3.2. An IRC will comprise of three members with relevant qualifications and professional experience.
- 6.3.3. All members of the IRC will be independent of the education provider, have formally agreed to comply with the AOAC Conflict of Interest Policy and must not have had any prior involvement in the accreditation decision being reviewed.

6.4. Conduct of the Internal Review

- 6.4.1. After receiving a valid application, the IRC will undertake an assessment of the application for internal review by reconsidering all relevant areas of the application for accreditation that relate to each reason for the review raised by the education provider.
- 6.4.2. To support independence and impartiality, the IRC has complete autonomy to undertake their review and is separate from the accreditation assessment team (AAT) involved in the processes leading to the original decision. The principles of procedural fairness will be applied throughout the conduct of the internal review.
- 6.4.3. The IRC will meet to discuss the impending review and determine the process to be undertaken for the independent secondary review. The IRC essentially follows the same process as the accreditation assessment team (AAT). The education provider will be informed of the process and timeframe.

- 6.4.4. The time frames for completion of the internal review are dependent on the complexity and quality of evidence and responsiveness of the education provider. Timeframes are managed by negotiating key dates with the education provider. The education provider is solely responsible for providing requested evidence within the negotiated timelines.
- 6.4.5. In conducting its secondary review of the accreditation application, the IRC will assess all relevant information and evidence provided by the education provider relating to the review. At the committee's discretion this may include:
- a. The assessment team's accreditation report.
 - b. Information submitted by the education provider to clarify the scope of the internal review against the decision.
 - c. Further information from the assessment team, the education provider or AOAC staff.
 - d. During its review, the IRC may contact the education provider in writing to request clarification.
 - e. May conduct a site visit.
 - f. Must notify the education provider in writing of any new evidence which the IRC considers relevant and seek the education provider's response to that evidence.
- 6.4.6. Where a site visit is required for the purposes of the internal review, the site visit date will be negotiated between the IRC and the education provider and be undertaken within a reasonable timeframe that is mutually agreeable.

6.5. Outcome of an Internal Review

- 6.5.1. After completion of the review, the IRC provides its findings to the AOAC Professional Practice Committee (PPC) and the AOAC Board.
- 6.5.2. Following the review of the decision, The IRC may:
- a. affirm the accreditation decision,
 - b. vary the accreditation decision,
 - c. revoke or set aside the accreditation decision,
 - d. substitute the accreditation decision with a new one, as specified by the IRC.

6.6. The PPC/AOAC is bound to make an accreditation decision that upholds the IRC's determination about the original accreditation decision.

6.7. Notifying an Education Provider of the Outcome

AOAC will notify the education provider in writing of its accreditation decision following the internal review. As far as possible, AOAC will seek to notify the education provider of the decision within four weeks of the date the AOAC Board receives the IRC's written determination about the original accreditation decision.

7. Roles and Responsibilities

- 7.1. The AOAC EO has overall responsibility for facilitating PPC access to information and documentation to ensure AOAC continues to be satisfied that OsteoBA approved programs of study are being delivered against the approved accreditation standards and within the accreditation expiry date. The EO has discretionary powers in relation to this policy including seeking additional information that would be reasonably required by the PPC.
- 7.2. The EO is responsible for ensuring that:
 - a. the relevant parties are informed of the policy and procedures for undertaking an internal review,
 - b. the IRC are convened, and outcomes communicated within timeframes outlined in this policy.

8. Confidentiality

All activities involved in the processing of an internal review, including the content of any application by the education provider and the decisions and deliberations of the AOAC IRC are subject to the AOAC Committee's Privacy Policy. Members of the IRC will be required to sign an AOAC Confidentiality Agreement prior to reviewing appeals.

9. Correspondence to the Education Provider

Any correspondence to be sent by AOAC for the purposes of an internal review must be sent to the education provider's email address including a read receipt to confirm delivery date.