

Speech Pathology Australia



*Giving people a say in life*

# **Submission**

by

**Speech Pathology Australia**

to the

## **Joint Committee on Higher Education Inquiry into the Desirability of a National Higher Education Accreditation Body**

March 2008

The Speech Pathology Association of Australia Limited  
2<sup>nd</sup> floor, 11-19 Bank Place, Melbourne VIC 3000  
Phone: 03 9642 4899 Fax: 03 9642 4922

Email: [office@speechpathologyaustralia.org.au](mailto:office@speechpathologyaustralia.org.au) Website: [www.speechpathologyaustralia.org.au](http://www.speechpathologyaustralia.org.au)  
ABN 17 008 393 440

Speech Pathology Australia welcomes the opportunity to provide feedback to the consultation discussion paper by the Joint Committee on Higher Education (JCHE) into the desirability of a national higher education accreditation body. Our comments are submitted below in accordance with the consultation questions.

## **Background to Speech Pathology Australia and role in professional accreditation**

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The Speech Pathology Association of Australia Ltd (Speech Pathology Australia) is the national peak body for speech pathologists in Australia, representing approximately 4,200 members. A speech pathologist is a specialist qualified to provide a variety of services to people with communication and swallowing difficulties that may be present across the life span.

Speech Pathology Australia is the sole national professional body for speech pathologists in Australia and is recognised by the Federal Government of Australia, Department of Education, Science and Training, as the professional body representing speech pathologists in Australia.

Speech Pathology Australia grants accreditation to speech pathology degree programs that meet specific professional requirements.

Accreditation assures the general public that speech pathology degree programs in Australia have the appropriate qualities to produce professional speech pathologist practitioners who are eligible for membership of Speech Pathology Australia.

A speech pathology degree program accredited by Speech Pathology Australia permits graduation of only those students who have achieved the entry-level standard specified in the Competency Based Occupational Standards. The Competency Based Occupational Standards for Speech Pathologists (CBOS 2001) is accepted by the profession as the expression of the knowledge, skills and attitudes required of someone entering the profession of speech pathology in Australia.

By accrediting speech pathology degree programs, Speech Pathology Australia aims to:

- Maintain appropriately high minimum standards of the speech pathology profession in Australia
- Stimulate maintenance of high standards and continuing improvement in the quality of professional education in speech pathology
- Provide support to the university programs to encourage excellence in professional preparation
- Support varied and flexible degree programs that are aligned with the changing realities of the speech pathology workplace.

Speech Pathology Australia has been responsible for the accreditation of all Australian university educational programs to educate speech pathologists to entry level since the inception of University level speech pathology programs in 1962. Since the year 2001 the accreditation of speech pathology courses has been based on outcomes and an in-depth evaluation of the assessments of competency achieved by graduating students.

## Consultation questions

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**1a. Is the analysis in this paper of the context for regulation of higher education under the national quality assurance framework sufficient?**

Speech Pathology Australia does not feel the analysis has sufficiently reviewed the differences between Government accreditation (whether at State or National level) and professional accreditation. The Association understands that there are significant and important differences between the two kinds of accreditation. The Association sees the Government accreditation as mainly an initial 'one-off' accreditation of a program as being viable; of university level; having adequate staff, facilities and infrastructure; and worthy of the institution introducing it and of Australian Government endorsement. This is followed up with quality assurance evaluations through the university and/or AUQA, which do not however focus to any great degree on the specific content of any one program. Speech Pathology Australia relies on the initial Government accreditation and quality improvement programs to underpin the courses it accredits. It considers that professional accreditation necessarily takes into consideration in great depth the specific content of program, especially in relation to:

- the relevance to the profession as it exists in Australia;
- the scope of the content;
- the level at which it is taught and learned;
- the experiences of the students that are required for them to achieve competency (i.e. clinical practicum).

The accreditation process the Association has designed is to enable it to be assured that graduates would be of a sufficient level academically and practically for them to practise as a speech pathologist at entry level.

The accreditation evaluation has been built around the explicit entry level standards of the profession (Competency Based Occupational Standards 2001) which are nationally and internationally recognised. These standards are well accepted by the profession, the universities and employers in Australia and are also the basis for successful mutual recognition negotiations with international professional associations [RCSLT (UK), CASLPA (Canada), and ASHA(USA)], (Mutual Recognition Agreement 2004). The Association feels it would not be possible to achieve the strong professional recognition of the Australian qualifications without the integral involvement of the Association in accrediting professional programs.

Recent comment from all Australian speech pathology courses confirms that the Association's accreditation is their primary (and in some cases sole) means of accreditation at a course level, with some having involvement in AUQA evaluations and university external reviews to varying levels. As a consequence there was no view communicated that duplication was occurring. In contrast, feedback from the speech pathology programs consistently indicates that the Association's accreditation process is well received and valued with respect to being appropriate and constructive, and in assisting in the ongoing review and improvement of course focus and content.

**1b. What other issues and drivers might be considered particularly in terms of the extent to which the nature of the activity is state-specific or nation in character?**

Speech Pathology is a partially registered profession in Australia, with registration only being in place in Queensland. The Speech Pathologists Board of Queensland has adopted the standards of the Association and defers to the Association's accreditation system for its own accreditation, therefore state-specific accreditation has not an issue for the speech pathology profession as the national accreditation is the bench mark used. This is one advantage of using the national professional association as an agent for profession-specific course accreditation.

**2. How do you assess the advantages and disadvantages as outlined in section 3 above of the current arrangements in relation to:**

**a. National consistency;**

The Association sees within-discipline national consistency as essential and valuable. Protocols and principles to guide accreditation would be welcomed. It is very different however to consider across-discipline accreditation. The committee might look with interest at the situation with regard to the accreditation of health professionals in the UK. There, a general national accreditation has been instituted by the Health Professions Council which has been deemed unsatisfactory by many of the professional associations covered by the Council. The Royal College of Speech and Language Therapists (RCSLT) has re-instated its own accreditation which is valued by many employers. The result for the speech pathology profession in the UK is that the universities not only have to undertake the HPC accreditation, and the internal university reviews, but also the RCSLT accreditation resulting in a cumbersome, expensive and inefficient imposition on university programs.

**b. The efficiency of the current relationship between accreditation and quality audit functions?**

Currently there is limited communication and direct relationship between AUQA and the professions. However the professional association relies on the quality improvement programs of the university to provide the up to date and high standard of pedagogy and infrastructure required in a university, while this process does not impinge on the content of the course, per se.

**c. Are there advantages/disadvantages not covered?**

Please note the comment about the UK situation in 2a.

- 3. Are there further improvements that could be made to the current arrangements towards further harmonisation (including options for the establishment of a national higher education accreditation body) to strengthen national consistency and improve the efficiency of the current relationship between accreditation and quality audit functions?**
- 4. What uniform models (including options for the establishment of a national higher education accreditation body) to strengthen national consistency and improve the efficiency of the current relationship between accreditation and quality audit functions?**

Speech Pathology Australia feels that if a national higher education body was in place, it would be essential that discipline specific accreditation for professions was retained. Professional accreditation should be kept separate from general accreditation mechanisms in order for this to maintain relevance to the workplace and to the standards of the profession. Use of the professional associations' accreditation programs could be made as agents of the national body which could then allow for the adoption of general principles and protocols without losing the relevance of the accreditation to the profession. Re-accreditation is generally carried out by the professional bodies at 5 – 7 year intervals. Speech Pathology Australia considers that these could be harmonised with the AUQA reviews and sees both as essential processes.

- 5. For each national body option under both harmonised and uniform models, how should it be configured in terms of the following factors?**
  - a. Roles, functions and decision-making powers;**
  - b. Governance arrangements**
  - c. Resourcing requirements;**
  - d. Relationship between the body and professional accreditation schemes; and**
  - e. Relationship between the body and AUQA**

Speech Pathology Australia feels this question is premature. It may be that existing models are the most economical and efficient. Speech Pathology Australia's accreditation is

1. Nationally consistent
2. Internationally recognised
3. Economical
4. Regularly reviewed and is involved in ongoing quality improvement activities.

**6. What are the relative advantages and disadvantages of these models in relation to the regulation of offshore provision?**

Accreditation of off-shore courses is somewhat complex. It can present a difficulty in the demand for recognition of qualification in Australia where the context of practice in the country of origin is different from that in Australia. In Speech Pathology there is an absolute need for practitioners to have excellent English competence as practitioners work to remediate language disorders. Although accreditation of off-shore courses can be achieved it needs to be clear that it does not necessarily equate to a licence to enter and practise in the profession in Australia without further assessment.

**7. How would the likely establishment and transition costs of any new models measure up against the potential benefits in terms of improved national consistency (taking into account direct and indirect costs for both government and institutions?)**

Speech Pathology Australia provides a most economical accreditation which takes into account the participation of all the universities in Australia in supplying personnel to work on the accreditation panels. It is hard to see that there can be any greater economy achieved from an alternate model. There is no direct cost to the government and low costs for the universities have been maintained over the years.

**8. Are there other issues and considerations that should be taken into account in developing and analysing options?**

Nil at present.

Again Speech Pathology Australia wishes to thank the Joint Committee on Higher Education for the opportunity to comment on this discussion paper. We would be pleased to comment further where required and look forward to receiving further advice on the Committee's deliberations.

Yours Sincerely



**Gail Mulcair**  
Chief Executive Officer

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