

Thank you for the opportunity to respond to the draft accreditation standards document titled:
Consultation: Draft medical radiation practice accreditation standard

This document is of considerable length and would pose an arduous task both for higher education institutions to undertake, and for an accreditation team to assess. It is of course important that the accreditation of Medical Radiation programs ensure that programs of study and education providers are meeting accreditation standards, however the focus of this document should be to ensure that “education providers give students the knowledge, skills and professional attributes to competently practice in the profession”. (<http://www.medicalradiationpracticeboard.gov.au/Accreditation.aspx>).

Upon examination of the content, this document does not reflect an appropriate balance between institution management and governance and ensuring that the program is adequately equipped to produce competent graduates. I would ask that the Accreditation Committee re-examine the document with this in mind and consider combining similar criteria to ensure a rigorous yet achievable accreditation process for those institutions offering Medical Radiation programs.

An example of this exists in standard 1.2: Financial viability and safeguards. As institutions offering Medical Radiation Programs are approved higher educational providers, monitoring of financial viability and safeguards are performed by the relevant bodies (i.e. TEQSA, DEEWR). This standard could be modified to ensure that the institutions delivering Medical Radiation programs are an approved higher education provider only, as financial resources and management are inherent in this approval.

In addition, I would welcome some clarity around standard 3.5.7 which requires benchmarking of academic standards against similar accredited programs offered by other education providers. It is difficult to know how this would be achieved as this information is not freely available and some guidance should be added to assist this.

I recommend that the Committee also consider reviewing standard 3.4.1. *(To meet this standard, the education provider must provide evidence that it: has appointed academic and research leadership staff at an associate professor level or higher to provide guidance to the medical radiation practice program and its staff).*

Consideration should be given when applying this standard of the absence of a large pool of Australian and international Medical Radiation academics who would meet this level D and E requirement. I ask that the committee consider modifying this standard to include leadership at this level which may be external to the Medical Radiation program, but still provide direct leadership to the program (i.e. associate Head of school or Head of school).

Thank you

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