

8 October 2007

Adj Professor Margaret Banks  
Policy Team Manager  
ACSQHC  
GPO Box 5480  
Sydney NSW 2001

Dear Professor Banks,

**Re: Consultation Paper – Review of National Safety and Quality Accreditation Standards August 2007**

Thank you for asking the College to comment on the above document, in particular sections 5 and 6.

The College acknowledges and agrees about strength of the pathology approach to accreditation and in particular the current NATA/RCPA/NPAAC accreditation processes. The College supports the document's suggestion of mutual recognition of accreditation of this process and the desire not to duplicate existing regulatory frameworks. This is a major step forward from the original discussion paper. However, the College wishes to stress that with any new approach care must be taken that mutual recognition is granted for the entire NATA/RCPA accreditation process and not just for the technical component of it (otherwise there will be duplication again for the "QI" component – see below).

One specific point in relation to Pathology is that while the College supports the actual approach of mutual recognition of existing accreditation programs in Pathology, placing Pathology in the non-clinical/technical compliance bracket causes some concern as clearly Pathologists are still doctors and professionals.

There is merit in the proposal to have national safety standards, presumably focused on key potential failure points of greatest patient risk (although this is not actually spelt out). It will be challenging to identify the measures, but this should not preclude the development of the proposal and subsequent implementation.

The College wishes to state that separation of safety and "quality improvement" makes very hard reading. This in effect is separating technical standards from Quality System standards. This is a non-standard approach and the College believes it would be more appropriate to be consistent with international standards of "QI" terminology.

The document would be much clearer if it explained the approach in the following way:

1. Safety ("technical") standards and Quality Systems will be separately defined and accredited.
2. Standards setting and Conformance Assessment will be undertaken by separate bodies.

3. Mutual recognition would be granted for specific disciplines (such as pathology).

The diagram shown in Figure 1 (Alternative Model) on page 20, which summarises the whole proposal, is difficult to understand. The College considers a simple table would convey the relationships much more clearly.

Finally the College supports:

1. Surveyor (accreditors/assessors) training and reduction of variation between surveyors.
2. Unannounced assessments.
3. Tracer methodology (following a patient through the system, rather than just accrediting snapshot by snapshot).

Sincerely,

A handwritten signature in black ink, appearing to read 'Debra Graves', written in a cursive style.

Dr Debra Graves  
**Chief Executive Officer**