RANZCO The Royal Australian and New Zealand College of Ophthalmologists

THE MEDICAL EYE SPECIALISTS

30 June 2014

Executive Officer
Medical
Australian Health Practitioner
Regulation Agency (AHPRA)
GPO Box 9958
MELBOURNE VIC 3001

By email: medboardconsultation@ahpra.gov.au

Dear Sir / Madam

AHPRA Consultation – Core Registration Standards

The Royal Australian and New Zealand College of Ophthalmologists (RANZCO) thanks the Medical Board of Australia for the opportunity to comment on its proposed revised draft registration standards covering professional indemnity insurance, continuing professional development and recency of practice.

RANZCO's mission is to drive improvements in eye health care in Australia, New Zealand and the Asia Pacific Region through continuing exceptional training, education, research and advocacy. Underpinning all of the College's work is a commitment to best patient outcomes, providing contemporary education, training and continuing professional development, evidence-based decision making, collaboration and collegiality. RANZCO also seeks to educate the general public in all matters relating to vision and the health of the human eye and advocates for accessible ophthalmology services for patients.

Registration Standard: Professional Indemnity Insurance (PII Standard)

RANZCO have no comments on the revisions to the current PII Standard, other than to support rewording that makes it simpler and clearer to understand. We have no concerns with its review every five years or earlier if required.

Registration Standard: Continuing Professional Development (CPD Standard)

RANZCO supports revision of the CPD Standard and has no concerns with its review every five years or earlier if required.

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As a general comment, the expectations regarding colleges are not clearly defined in the document despite colleges being a major stakeholder in the implementation of this standard. RANZCO believes this should be addressed in the final revision.

In terms of specific comments, RANZCO believes the following issues should be addressed in the final revision:

1. '*What must I do?* … *1. Medical practitioners who have specialist registration…*' – The two dot points here do not take into account medical practitioners who are registered in more than one specialty. At point 3 of 'More Information' is explains that it is valid for medical practitioners registered in more than one specialty to undertake CPD that fulfils the CPD requirements of multiple specialist colleges. This could be included as a third dot point and the effect of this would be to make the revised standard clearer.

2. '*What must I do? … 7. Medical practitioners who have general registration only …*' – A dot point should be added stating that this category of practitioner may choose to undertake CPD activities through a specialty medical college. There are many courses that specialty colleges offer that are relevant to practitioners with general registration.

3. *Are there exemptions to this standard?...Medical Practitioners who have…'* – The first paragraph should employ wording that is consistent with the previous document. For example, '*limited registration in the public interest*' is presented earlier in the document as '*limited registration (public interest – occasional practice)*'. Consistent wording would ensure clarity.

4. *'Are there exemptions to this standard?...The Board may also…'* - Further explanation is required regarding how long exemptions are for and how Medical practitioners can apply for an exemption.

   RANZCO notes that the CPD Standard gives specialty colleges the authority and discretion to set CPD requirements for practitioners with specialist registration. Given this, RANZCO would appreciate guidance from the Medical Board in relation to what the requirements are for colleges in managing Fellows who fall into the 'exceptional circumstances' category and are therefore non-compliant. RANZCO also feels that it should be made explicit that, in addition to the Medical Board, specialty colleges may grant an exemption or variation from the CPD Standard in exceptional circumstances. Whether the College needs to report exemptions to the Board, and how this interacts with the list of possible consequences of not meeting the standard must also be established in this standard.

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5. '*Evidence*' – RANZCO notes that this section in the revised standard contains repetition and appears to contain inconsistencies. . In order to ensure the record-keeping requirements are as clear as possible and to make explicit that the onus to keep records is on the practitioner, RANZCO suggests the following deletions be made:

   You should maintain records of your CPD activity for audit purposes.

   The length of time that you need to keep your records will depend on your type of registration. If you have specialist registration, the length of time that you need to keep your records will depend on the CPD requirements of the college.

   You are required to keep your records for three years if you have:
   - *only general registration*
   - *provisional registration*
   - *limited registration.*

   ~~*If you have specialist registration, you must meet the requirements for CPD set by the relevant specialist medical college/s. That means that the length of time that you must keep your CPD records will depend on the college requirements. For example, some colleges have annual programs, some have triennial and some have five year programs.*~~

   ~~*If your college has annual CPD requirements, you are required to keep your records for three years.*~~

   ~~*If your college has CPD requirements that span more than 12 months, y*~~*Y*ou *are required to keep your records for the entire duration of the program or cycle set by the college and then an additional two years. For example:*
   - *annual cycle – keep your records for three years*
   - *triennial cycle – keep your records for five years*
   - *five year cycle – keep your records for seven years.*

   ~~*You may keep your own records, use college processes or use another third party to keep your records.*~~

In order to maintain consistency between this standard and the registration standard on 'Recency of Practice', the two standards could cross-reference each other.

Registration Standard: Recency of Practice (Recency Standard)

RANZCO has no concerns with review of the Recency Standard every five years or earlier if required.

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The major concern is the lack of clarity on the role of specialty colleges in the practical application of this standard. RANZCO would appreciate such clarification from the Medical Board either in the standard or separately.

Other aspects of the Standard which require clarification are:

- '*At a minimum, you must complete the equivalent of one year's CPD activities…*' – this should be given in hours e.g. 50 hours not as 'one year' as hours are the standard unit for CPD activities.

Should you require any further information in relation to this submission please contact Ms Ritu Mohan, RANZCO Policy Officer, at rmohan@ranzco.edu.

Yours sincerely

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