



28 May 2013

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Submission - Pathways to Registration

I refer to the Medical Board of Australia's consultation paper on '*proposed changes to the competent authority pathway and specialist pathway for international medical graduates*'.

The Rural Doctors Workforce Agency (RDWA) is a not for profit organisation funded by the State and Federal governments to recruit and support medical practitioners and allied health and nursing professionals in rural South Australia. Over the last fifteen years, the RDWA has gained extensive experience and developed comprehensive knowledge in the recruitment processes of International Medical Graduates (IMGs). RDWA's expertise in this area has resulted in over 250 IMGs being recruited to rural communities in South Australia.

Competent Authority (CA) Pathway

As the RDWA predominantly works with rural General Practitioners (GPs), the comments presented here are from a general practice perspective.

The proposed changes to the CA pathway appear to streamline the process making it easier for candidates to navigate.

However, there appears to be an inequity in that recent graduates who meet the requirements for the CA pathway have less "obstacles" to go through if they want to work in general practice than doctors who have trained in CA countries (e.g. USA and Canada before 1992) and do not meet the requirements for this pathway.

It is obvious that these more experienced GPs are better suited for rural practice, but as they do not meet the requirements for the CA pathway, they need to be assessed as specialists. Whereas, under the proposed system, younger doctors with less GP experience will be able to obtain provisional registration through a less labour intensive process and after 12 months of supervised practice are able to obtain general registration.

With regard to supervision levels for doctors on provisional registration and how the supervision level will be determined, it is unclear whether doctors will be required to go through a Pre-Employment Structured Clinical Interview (PESCI) process and whether recency of practice in general practice will affect their ability to obtain provisional registration.

The RDWA believes that it is appropriate and reasonable to grant provisional registration to applicants in the CA pathway. This allows applicants to work in a supervised environment where they will receive support. We believe that 12 months is an appropriate period of time for supervised practice.

In relation to IMG's undertaking specific rotations, it is our view that doctors on the CA pathway should not complete specific rotations, however, for those doctors working in general practice,



they need to be able to show that they have gained broad experience to cover the domains of general practice (i.e. their experience is not limited to only skin clinics or aged care facilities).

Specialist Pathway

The streamlining of the administrative processes for this pathway is a positive step to ensuring that IMGs are not burdened with excessive paperwork. It also removes some of the confusion about the different agencies' roles in the assessment process.

With the AMC no longer assessing applications, the colleges will need to be appropriately resourced to ensure timely processing of applications. The protocols used by the AMC to undertake the assessments should continue to be used by the colleges.

The revised comparability definitions can be applied to general practice and will ensure that the same standards/assessments are applied consistently.

The use of a portal for communication between agencies is an appropriate proposal, however, the portal will need to be well managed to ensure its success. The portal will ensure that there is no duplication of effort on the applicants' part as well as the agencies and will, it is anticipated, streamline and shorten the relevant processes.

Thank you for the opportunity to contribute to this consultation process.

I understand that this submission will be made publicly available via the Board's website.

Yours sincerely

Lyn Poole
Chief Executive Officer