



27 May 2016

Dr Joanne Katsoris
Executive Officer, Medical,
Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

Dear Dr Katsoris,

Draft Revised Registration Standard for Specialist Registration

The Australian Medical Council (AMC) is pleased to provide the following responses to the public consultation paper on a draft revised registration standard for specialist registration.

Although the AMC has not been directly involved in regulatory matters relating to the registration of general and specialist medical practitioners since the implementation of the National Law in July 2010, it was remained active in the assessment processes for specialist international medical graduates (SIMGs) until July 2014 and is still involved in aspects of primary source verification of SIMGs. In addition the Specialist Education Accreditation Committee is responsible for assessing programs and assessment processes that lead to specialist registration and the standards for CPD required by specialists who seek continued specialist registration. On the basis of this involvement and background, the AMC supports the proposed revision and clarification of the registration standards for specialists.

Questions and Responses

In relation to the specific questions on which feedback is sought:

1. Although the current registration standard has resulted in greater consistency of process in the registration of specialists, there are still some aspects of the standard that are causing confusion or need to be updated.
2. The draft revised standard clarifies a number of issues and updates recent developments such as those relating to primary source verification that impact on specialist registration.
3. The AMC does not consider that any content needs to be altered or deleted.
4. An additional note needs to be added under the section Specialist Pathway – Specialist Recognition regarding the need to establish a profile with the AMC so that results of primary source verification and specialist assessment can be posted on the AMC Results Portal for access by Specialist Colleges and designated AHPRA personnel.
5. The AMC has no other comments to add.

In relation to the specific proposed changes to the registration standard:

A. Removal of the dual meaning of “Fellowship”

The AMC supports the proposed approach to clarify the term “fellowship” in the revised standard. We consider however that some confusion is likely to remain about the

differences between successful an SIMG assessment process, recommendation for specialist registration, ongoing membership of a specialist college, and the fellowship as a qualification requirement for registration. If this statement is taken from the registration standard, would the Medical Board consider providing clarifying information elsewhere on its website?

B. Guidance for Australian and New Zealand graduates with overseas specialist qualifications

The AMC's experience with SIMGs suggests that the issue of Australian and New Zealand graduates who have overseas specialist qualifications has caused some concern. As such the AMC supports the approach to clarify this situation in the revised standards, subject to the addition of a reference to establishing a profile on the AMC portal (see response to 4. above)

C. Removal of information on documents required for general registration

Provided there is a link to the information relating to general registration, the proposed change is supported. (AMC experience with primary source verification indicates that a significant number (60+%) of applicants submit both general and specialist qualifications for verification.)

D. Clarification and updating information on primary source verification

The AMC supports the proposed changes to update information about the new Electronic Portfolio of International Credentials (EPIC) process that was implemented in late 2015 and replaces the previous primary source verification process administered by the AMC through the Educational Commission for Foreign Medical Graduates (ECFMG).

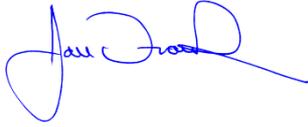
The AMC notes that there continues to be some confusion amongst SIMGs regarding the need to lodge an application with the AMC to establish a profile on the AMC results portal. Since the Specialist Medical Colleges assumed direct responsibility for processing applications for assessment by SIMGs in July 2014, a number of overseas trained specialists have not established a profile with the AMC, as a result of which, the outcome of their assessment is not visible to AHPRA staff when processing applications for specialist registration. This situation has been compounded with the implementation of the new EPIC procedure from October 2015, which enables IMGs to apply directly to the ECFMG for verification of their medical qualifications, by passing the AMC. The AMC proposes that a note be added to the section of the standards headed Specialist pathway – specialist recognition to indicate that applicants must apply to the AMC to establish a profile so that the PSV and assessment outcomes can be posted for the relevant Specialist College and AHPRA staff to access and confirm.

Proposed Options

The AMC considers that the current standard for specialist registration has generally worked well but has led to some confusion that could be corrected with the minor changes proposed in the draft revised standards. Accordingly, the AMC supports Option 2 with the addition of a note regarding the need to establish a profile for the AMC results portal.

Thank you for the opportunity to comment on the proposed revised standards.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Ian Frank', with a long horizontal flourish extending to the right.

Ian Frank AM
Chief Executive Officer