



30 May 2013

Medical Board of Australia  
GPO Box 9958  
Melbourne Vic 3001

**Re: Consultation - Pathways to registration**

Email [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Dear Medical Board of Australia

The Australian College of Rural and Remote Medicine (ACRRM) thanks the Medical Board of Australia (MBA) for the opportunity to provide further comment regarding proposed changes to the competent authority and specialist pathway for international medical graduates in this the consultation stage of the review.

**Competent authority pathway**

ACRRM has reviewed the consultation paper in regard to the review of the competent authority pathway and express disappointment that matters raised by ACRRM in the preliminary consultation phase have not been addressed in the current review phase.

In our response of 8 March 2013, ACRRM provided overall support for the intent of the proposed changes but raised concerns in regard to the appropriateness of the revised processes within a general practice environment. The current processes describe the steps and accountabilities for competent authority pathway for both hospital based practice and general practice. The development of separate but related processes occurred because it was identified that the practice environments were different and required different accountabilities to ensure robustness and validity.

ACRRM would like to draw your attention to our previous response in which we raised concerns in regard to potential conflict of interest issues and or bias which may occur in the general practice setting and very importantly that provisional registration makes the assumption that the IMG would be working at an intern level with close supervision (=level1). This is not currently feasible in general practice, particularly in many Area of Need practices where the majority of IMG's are working.

As stated in our previous response ACRRM would support the introduction of the revised processes for competent authority pathway doctors entering intern level positions in a hospital setting but not in general practice. For a revised competent authority process to be open to doctors wishing to enter general practice, an independent assessment process similar to the current arrangements would need to be included. Alternatively or in addition

to, investment would need to be made to facilitate the development and then resource a program that supported level 1 supervision and training in general practice.

### **Specialist Pathway**

ACRRM has reviewed the current consultation paper in regard to specialist pathway and wish to advise, that ACRRM believe the proposed changes which are largely administrative will streamline the process and that the changes address a number of the recommendations of the Lost in the Labyrinth report. ACRRM therefore support the overall direction of the proposed changes but do have some concerns in regard to implementation.

As noted in the Colleges response to the preliminary consultation paper the proposed changes to the administrative systems for specialist pathway would lead to an increase in the administrative burden at the College level. For example the proposal process includes:

*Applicant submits application for recognition to the college – Applicant sends application and required supporting documents to relevant college. The college ensures documentation is uploaded to portal.*

ACRRM supports this proposal subject to appropriate funding and training being made available to assist Colleges with the implementation and ongoing use of the portal as the administrative tool.

ACRRM has also noted the proposed changes to the Area of Need (AON) process and are overall supportive of the proposed changes. The College particularly noted the proposed requirements in regard to “supervision requirement being recommended by the college and imposed by the MBA”. ACRRM believes that supervisor arrangement for IMG’s is a major issue across all assessment pathways and would recommend such arrangements being considered for IMG’s on all pathways.

### **Further issues as raised by the NSIMGC**

As stated in our response to the preliminary consultation paper ACRRM concurs with the NSIMGC recommendation in regard to the need to progress issues not within the committee terms of reference. ACRRM wishes to advise that it would be happy to contribute to the processes to progress these matters.

ACRRM has also noted the ‘Working Group Discussion Points/Issues for Further Consideration/Action (proposed group to undertake Action)’ and wishes to advise that the College is happy to support the work particularly of the SIMG Manages Group in addressing the issues raised.

We look forward to working with the MBA on these matters and should you require further information please do not hesitate to contact Di Wyatt, IMG Program Manager via email [d.wyatt@acrrm.org.au](mailto:d.wyatt@acrrm.org.au) or by phoning the College on 1800 223 226.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Marita Cowie'. The signature is fluid and cursive, with a large initial 'M' and 'C'.

Marita Cowie  
**Chief Executive Officer**