

May 30, 2013

Dr Joanna Flynn
Chair Medical Board of Australia

Open letter to Dr Joanna Flynn regarding the proposed changes to the competent authority and specialist pathways for International Medical Graduates

Dear Dr Flynn,

First, we would like to thank you for taking important steps to improve the efficiency of the system as described in your paper *Consultation on proposed changes to the competent authority and specialist pathways*. An efficient and transparent system with clearly delineated processes is important for facilitating the deployment of international medical graduates into the workforce. While we applaud the Medical Boards efforts to create a more streamlined system we nonetheless have significant concerns about the lack of IMG input into the process that spawned these recommendations. As a group we are baffled that IMGs were not invited to the table, particularly when the AMC and Specialist Colleges had official representation on the MBA National Specialist committee, which advised the MBA on these issues. We note that a "consultant" was involved in the process that may have been an IMG. An individual voice however is not the same as one representing a national IMG group. While the Medical Board is asking for public input on the proposed changes, this is not the same as being involved in the inception of these policies.

There a number of national IMG groups in Australia. Our organization the Australian International Medical Graduate Advice, Advocacy and Support network (AISAAN) represents a wide range of specialists and general practitioners working in the community and hospital systems, including those who have successfully navigated the AMC and specialist pathways and those who have limited registration. The vast majority of us have experienced the Australian specialist and AMC pathways first hand and therefore can provide invaluable input into the challenges faced by IMGs.

We would like to ask the Medical Board to explain why an official IMG representative from a national IMG organization was not invited to be a formal member on the MBA National Specialist IMG Committee. We also ask the MBA take steps to rectify this situation, and to assign a formal IMG member representing a national IMG body to be a member of this committee.

Our major concern is that these recommendations do not address the core problems with the system, namely the method in which specialist IMGs qualifications, professional experience and competency are assessed. Under the National Law the Medical Board is responsible for these processes - the

accreditation of IMG specialists. The Lost in the Labyrinth report has acknowledged the hurdles that IMG specialists face with regards to obtaining Australian qualifications. Recommendation number eight states

Specialist medical college examinations should only be used as an assessment tool when specialist IMGs are recent graduates, or when deficiencies or concerns have been identified during workplace based assessment (WBA) (Lost in the Labyrinth Report on the inquiry into registration processes and support for overseas trained doctors Recommendation 8; pg 96

The use of WBA to assess the competency of experienced IMG specialists is not being done except for in a small minority of cases. Many highly experienced IMG specialists who have competently practiced in this country for many years are still being subjected to highly inappropriate and discriminatory exams. As a result of the lack of support for this recommendation by many of the Colleges, hundreds if not thousands of IMG specialists are at risk of deregistration in the next few years.

An example of this problem is the plight of hundreds of IMG psychiatrists working in Australia. While the College has workplace-based assessment in place for those doctors from countries like the UK, Canada, Ireland and the US, this only represents a small percentage of the highly experienced IMG psychiatrists working in Australia. Not only are these IMGs subject to exams but also the pass rate for the IMGs is set at a higher level than that for the Australian trainees. While the College has defended this practice by stating that the IMGs are being assessed at a more advanced level, the fact remains that there is no valid comparison group. Only a small percentage of IMG psychiatrists have been able to pass this exam despite the fact that they have been practicing without incident for years in Australia. The IMG psychiatrists have attempted to address this problem with the College through the OTP committee but the College has continued to ignore these concerns.

The College of Psychiatrists is not alone. The parliamentary inquiry into the registration processes and support for overseas trained evidence from IMGs who faced similar problems with multiple Colleges including those of Surgery, Anaesthesia, and General Practice. Physicians, Obstetrics and Gynecology, and Ophthalmology, to name a few.

The Medical Board is directly responsible for ensuring that the Colleges take steps to develop WBA assessment methods for all experienced IMG specialists working in Australia, not just those from an elite group of English speaking countries.

We ask the medical board to ensure that the Colleges follow these recommendations and establish fair, valid and transparent accreditation processes for IMG specialists, and if they fail to do so revoke their accreditation authority. The Colleges must also ensure that there is meaningful IMG input into the development of these policies.

Failure to pass Specialist exams has very different implications for IMGs and Australian trainees. For Australian trainees it may mean a halt in their career progression at the very worst. For IMGs failure can mean deregistration and professional and personal ruin. In fact hundreds if not thousands of IMGs face deregistration in the next few years if this problem is not addressed. These doctors have made an invaluable contribution to the health and welfare of this country. They deserve a “fair go”, not to be tossed aside when they no longer serve this country’s purposes.

We call on the Medical Board and the Health Minister to establish a moratorium on the deregistration of IMG specialists who have not been successful in obtaining their Australian qualifications (within the four year period) solely as a result of difficulties passing specialist exams until such time that they can be assessed under a WBA model.

Finally we ask that the Medical Board join other major medical peak bodies, including the AMA, RACGP, RDAA in calling for the abolition of the 10 year moratorium. The Lost in the Labyrinth report has asked for a scaled reduction in the duration of the 10 year moratorium in keeping with the length of service expected of the Bonded Medical Places scheme. We believe that it is a failed policy and unjust and that in the longer term is deleterious to national health and the Australian Health Workforce.

In closing we would like to offer our help in terms of providing the Medical Board with advice and guidance based on our member’s input and views.

We look forward to hearing from you and would be happy to discuss how we can work towards a more effective relationship based on mutual respect and more effective communication.

We thank you in advance for your support

A handwritten signature in black ink that reads "Sue Douglas". The signature is fluid and cursive, with the first name "Sue" being more prominent than the last name "Douglas".

Dr Sue Douglas MD, CCFP (Canada) Grad Cert HE, FACRRM (Australia)
Chair Australian IMG Support Advice and Advocacy Network

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Cc Hon Tanya Plibersek, Federal Minister for Health
Hon Peter Dutton, Federal member for Dickson, Shadow Minister for Health and Ageing
Hon Mark Butler MP Minister for Mental Health and Ageing
Hon Julia Gillard Prime Minister
Hon Tony Abbott Leader of the Opposition
Ms Jill Hall Chair, Committee into the Registration Processes and Support for Overseas Trained Doctors
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