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Subject: Consultation – Pathways to Registration
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Submission to Medical Board of Australia – Re Competent Authority (CA) and Specialist Pathways

Background and Declaration: I am an IMG who is currently under both pathways in question, the CA and Specialist Pathways. Since I decided to move to Australia, I have submitted at least ten professional applications to AMC, AHPRA and the Specialist College which has costed me a lot of time, effort and money. I have read in full the contents of “Lost in the Labyrinth” Report and it accurately describes many of the difficulties IMGs face and I am pleased that AHPRA, in collaboration with AMC and the Specialist colleges, have started working on the recommendations on the report

Competent Authority Pathway: This is one Pathway that was commended in the report by House of Representatives enquiry into IMG registration process, Lost in the Labyrinth. I agree with AHPRA’s proposal to eliminate the need to go to the AMC under this pathway. This will make the pathway much more simple and straightforward. It is worth highlighting that this may also cause potential problems for some IMGs as some Colleges require AMC certificate before an IMG can join their training programme (for example RACP as per [this link](#)). This can be easily solved by allowing IMGs who complete 12 months under the Pathway the option to apply for an AMC certificate if they need it.

With regards to Consultation Questions:

1. It is certainly appropriate to grant provisional or limited registration to CA Pathway candidates. There are candidates that were assessed and have worked in systems that have rigorous regulations and governance. They are IMGs who practiced as professionals in English speaking countries and finally they would have good standing from those competent authorities regulators.
2. I think 12 months is an appropriate period of time under the pathway. A shorter period will not ensure that candidates are well integrated into the Australian system and may not give assessors enough time to identify any issues that may impact on the practitioner’s safety in practice, especially if the candidate is rotating in different jobs.
3. I do not think that candidates under the CA Pathway should be asked to complete specific rotations for the following reason:
 - a. CA Pathway candidates do hold unconditional registration in the countries AHPRA and AMC considered as comparable
 - b. Competencies in Medicine the same among all specialities
 - c. AHPRA’s [limited registration report](#) is the same among all specialities – There are no speciality specific requirements

- d. Awareness of own limitations is a key skill that is essential for safe medical practice. If an IMG is not able to recognise own limitations, s/he would be unsafe to practice even if rotated through all medical and surgical specialities. It is worth highlighting that this particular safety skill, awareness of own limitations, is not limited to junior doctors but it remains essential even at the Specialist level.

Summary: The CA Pathway in its current format requires the IMG to submit several application with significant duplication in paperwork. Eliminating the need to apply to the AMC is a good step forward but candidates should be given the option of applying for AMC certificate after 12 months if this was an objective to them, separate from the registration process. I cannot see a need to specify rotations in view of the fact that competencies and skills are universal among all specialities.

Specialist Pathway: The elimination of the need to go to the AMC as well as the use of a portal for communication are certainly a good move forward that is also in line with the recommendations by the House of Representatives. As someone who had been assessed several times by RANZCP, I can make the following general comments about the Pathway

1. Area of Need Assessments: It would be ideal if AHPRA, in collaboration with specialist colleges, review this Pathway and the need for individual separate assessment for each AoN job. Whether assessments can be standardized and unified so that the College considers a candidate suitable or not suitable for an AoN Specialist Position in Australia. This has the following potential advantages:
 - a. Specialist IMGs will be able to be assessed as AoN Specialist without the need for a position to be offered. This will mean that they can start the process in their home countries
 - b. This will ensure that the significant delays in filling AoN positions is eliminated with significant benefits to the public
 - c. Specialist colleges may consider a final review or assessment to fine tune the level of supervision before the Specialist IMG is able to start the position
2. Comparability Definitions: Streamlining the definitions of comparability is essential in IMG Specialist assessment process. It is worth noting that this is not without significant implications on some colleges due to the need to train assessors and pilot the assessments under the substantial comparability pathways.

In summary, I am very pleased, as an IMG, to see the efforts by AHPRA to simplify some of the very complicated and lengthy assessment processes in the two pathways to registration above. I support the proposed changes which would have saved myself and my family a lot of effort, time, stress and money if they were implemented a couple of years ago. The above is a summary of my thoughts and general comments regarding

those two pathways.

Kind Regards

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