



## Public consultation

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April 2014

### You are invited to provide feedback on this public consultation

Review of registration standards:

- Limited registration for postgraduate training or supervised practice
- Limited registration for area of need
- Limited registration for teaching or research
- Limited registration in public interest

Draft guideline: Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

**Please provide written submissions by email, marked 'Consultation – Limited registration standards and draft guideline on short-term training in a medical specialty pathway' to [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au) by close of business on 30 June 2014.**

**Submissions for publication on the Board's website should be sent in a word document (or equivalent)<sup>1</sup>.**

**Submissions by post should be addressed to the Executive Officer, Medical, AHPRA, GPO Box 9958, Melbourne 3001.**

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<sup>1</sup> You are welcome to supply a PDF file of your feedback in addition to the word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and National Boards are striving to publish documents in accessible formats (such as word), in addition to PDFs. More information about this is available at [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx).

## Public consultation

The Medical Board of Australia (the Board) is releasing the attached consultation paper on the review of the registration standards for the four types of limited registration and a draft guideline on Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration. You are invited to provide your comments on the consultation paper, including the questions in the paper, by 30 June 2014.

## How your submission will be treated

Submissions will generally be published unless you request otherwise. The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion, and will not place on its website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the Board will remove personally-identifying information from submissions, including contact details. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board also accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cwlth), which has provisions designed to protect personal information and information given in confidence.

Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

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Attachment D: Draft revised registration standard for limited registration for teaching or research

Attachment E: Proposed guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

Attachment F: Questions for stakeholders on the proposed guideline

Attachment G: The Board's Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation

The current registration standards for limited registration are published on the Board's website at [www.medicalboard.gov.au](http://www.medicalboard.gov.au) under "Registration Standards".

# Overview of consultation

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April 2014

Draft revised registration standards for:

- Limited registration for postgraduate training or supervised practice
- Limited registration for area of need
- Limited registration in public interest
- Limited registration for teaching or research

Draft guideline: Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

## Summary

### Purpose of the proposals

1. The Health Practitioner Regulation National Law, as in force in each state and territory (the National Law) empowers the Board to develop and recommend to the Australian Health Workforce Ministerial Council (Ministerial Council) registration standards about the eligibility of individuals for registration or the suitability of individuals to competently and safely practise the profession. The Ministerial Council may approve a registration standard recommended by the Board.
2. The Medical Board of Australia developed the registration standards for the four types of limited registration that were approved by the Ministerial Council and took effect on 1 July 2010. These standards were scheduled for review at least every three years, in keeping with good regulatory practice.
3. Under the National Law, the Board may also develop and approve codes and guidelines to provide guidance to medical practitioners and which may be about other matters relevant to the exercise of the Board's functions.
4. An approved registration standard, code or guideline is admissible in proceedings under the National Law or the law of a co-regulatory jurisdiction against a medical practitioner as evidence of what constitutes appropriate professional conduct or practice of the profession.
5. The Board is inviting general comments on its draft revised registration standards for the four types of limited registration and the draft guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration (the guideline). There are also specific questions about the registration standards and proposed guideline in this consultation paper which you may wish to address in your response.
6. The Board has decided to consult on the proposed guideline and the draft revised registration standard for limited registration for postgraduate training or supervised practice together as they are closely related.

## Next steps

7. The Board will consider the consultation feedback on the draft revised registration standards and the draft guideline before finalising them. In accordance with the National Law, the finalised draft of the registration standards will be submitted to the Ministerial Council for approval.

# Overview

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April 2014

## Review of registration standards for limited registration

### Summary of issue

8. Under section 38(2)(c) of the National Law, the Board may develop and recommend to the Ministerial Council registration standards about the eligibility of individuals for registration or the suitability of individuals to competently and safely practise the profession. Under section 12, the Ministerial Council may approve a registration standard recommended by the Board.
9. The Board developed four registration standards for each type of limited registration available under the National Law. The standards were approved by the Ministerial Council and came into effect on 1 July 2010 following wide-ranging consultation. The National Law empowers the Board to grant limited registration as a medical practitioner to persons who are not qualified or eligible for general or specialist registration but who meet the requirements for the relevant type of limited registration set out in sections 65 – 72 of the National Law.
10. There are four types of limited registration granted for specific purposes. The four types of limited registration are:
  - Limited registration for postgraduate training or supervised practice
  - Limited registration for area of need
  - Limited registration in public interest
  - Limited registration for teaching or research
11. Limited registration allows internationally qualified medical practitioners who do not hold an approved qualification for general or specialist registration to provide health services under supervision in Board approved positions.
12. The registration standards set out the Board's requirements for an initial application for, and renewal of, each type of limited registration. The Board is reviewing its registration standards to address issues raised by stakeholders about the current standards, to ensure they continue to meet the objectives of the National Law and are worded as simply and clearly as possible.

### Options statement – registration standards

#### Option 1 – Status quo

13. Option 1 would be to continue with the existing registration standards for limited registration. The registration standards establish the Board's requirements for each type of limited registration. The Board has, however, identified a range of issues with the current standards, including the opportunity to clarify the language and structure to make them easier to understand.

#### Option 2 – Proposed revised standard

14. Option 2 would involve the Board submitting revised registration standards for limited registration to the Ministerial Council for approval. The registration standards would continue to outline the Board's requirements for each type of limited registration, with some minor changes to address issues raised by stakeholders and changes which aim to further clarify current requirements. The revised standards also have clearer wording and structure to make them easier to understand.

## Preferred option

15. The Board prefers Option 2.

## Issues for discussion

### Potential benefits and costs of the proposal

16. The benefits of the preferred option are that the draft revised standards:

- are user-friendly and provide some flexibility
- aim to further clarify current requirements
- strike a better balance between protecting the public and impact on registrants and applicants
- have been reworded to be simpler and clearer.

17. The costs of the preferred option are:

- expected to be minimal as the key requirements for registration and renewal of registration have not changed substantially
- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the new standard.

### Estimated impacts of the draft revised registration standards

18. The changes proposed in the draft revised registration standards are minimal, although more significant changes may emerge through consultation. The proposed changes address issues raised by stakeholders about the current standards and aim to further clarify the current requirements for limited registration. There is little impact anticipated on practitioners, business and other stakeholders arising from the changes proposed.

## Relevant sections of the National Law

19. Relevant sections of the National Law are sections 38, 65 – 72, 77 – 75 and 109.

## Questions for consideration

20. The Board is inviting general comments as well as feedback on the following questions.

- From your perspective, how are the current registration standards working?
- Is the content and structure of the draft revised registration standards helpful, clear, relevant and more workable than the current standards?
- Is there any content that needs to be changed or deleted in the draft revised registration standards?
- Is there anything missing that needs to be added to the draft revised registration standards?
- It is proposed that the draft revised standards are reviewed every five years or earlier if required. Is this reasonable?
- Do you have any other comments on the draft revised registration standards?

## Overview

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April 2014

### Draft guideline: Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

#### Summary of issue

21. Under section 39 of the National Law, the Board may develop and approve codes and guidelines to provide guidance to medical practitioners and which may be about other matters relevant to the exercise of the Board's functions.
22. The Board has developed a draft guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration (the guideline). The draft guideline aims to clarify for stakeholders:
  - a. the requirements and processes for registration for applicants who are not qualified for general or specialist registration seeking to undertake short-term training in a medical specialty
  - b. the roles and responsibilities of the Board and the specialist medical colleges in the assessment and registration of applicants seeking to undertake short-term training in a medical specialty.
23. There is also an opportunity to review the current requirements and processes to ensure they are appropriate and relevant under the National Scheme. This pathway has not been reviewed since its implementation in 2008.
24. The eligibility criteria for this pathway are contained in the Board's draft revised registration standard for limited registration for postgraduate training or supervised practice. The Board is therefore consulting on these two documents together as they are related.

#### Background

25. In February 2006, the Council of Australian Governments (COAG) agreed "to a national assessment process for overseas qualified doctors to ensure appropriate standards in qualifications and training as well as increase the efficiency of the assessment process<sup>2</sup>." The following pathways to registration were established as part of this COAG initiative:
  - a. Competent authority pathway
  - b. Standard pathway
  - c. Specialist pathway:
    - i. Specialist recognition (comparability assessment)
    - ii. Area of need assessment
  - d. Specialist pathway – short term training
26. The Board is proposing to change the name of the "specialist pathway –short term training" to "short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration". It will be referred to as 'short-term training in a medical specialty pathway.
27. The purpose of the name change is to ensure that short term training in a medical specialty is distinguished from the specialist pathway – specialist recognition, and to clarify that it does not lead to an approved qualification required for specialist registration. Specialist international

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<sup>2</sup> [http://archive.coag.gov.au/coag\\_meeting\\_outcomes/2006-02-10/index.cfm](http://archive.coag.gov.au/coag_meeting_outcomes/2006-02-10/index.cfm) accessed 15 May 2013

medical graduates (IMGs) who seek to qualify for specialist registration must apply under the specialist pathway – specialist recognition

28. This pathway allows internationally qualified specialists or international specialists-in-training to undertake training in a medical specialty in Australia for a short period, usually up to 24 months.

29. The draft guideline is based on:

- a. the previous decisions made by the COAG IMG Assessment Technical Committee and
- b. the requirements for registration contained in the Board’s approved registration standard for limited registration postgraduate training or supervised practice and the revised version of this standard.

### Options statement – proposed guideline

#### Option 1 – Status quo

30. There is currently no guideline for this pathway.

#### Option 2 – Draft guideline

31. Option 2 would involve the Board approving a guideline on this pathway. There has been confusion amongst stakeholders about the requirements for this pathway and the roles and responsibilities of the Board and the specialist medical colleges under this pathway. The draft guideline aims to address these issues and also provides an opportunity to review current requirements.

#### Preferred option

32. The Board prefers Option 2.

### Issues for discussion

#### Potential benefits and costs of the proposal

33. The benefits of the preferred option are that the draft guideline:

- aims to clarify current requirements
- aims to clarify the roles and responsibilities of the Board and the specialist medical colleges under this pathway

34. The costs of the preferred option are:

- expected to be minimal as the proposal does not change the current requirements for registration and assessment of applicants seeking “short term training in a medical specialty”
- applicants, other stakeholders, AHPRA and National Boards will need to become familiar with the proposed guideline.

#### Estimated impacts of the draft guideline

35. There is little impact anticipated on practitioners, business and other stakeholders arising from the proposed guideline. The proposed guideline aims to clarify the current requirements of this pathway and aims to clarify the roles and responsibilities of the Board and the specialist medical colleges under this pathway.

36. The proposed guideline is based on the previous decisions made by the COAG International Medical Graduate (IMG) Assessment Technical Committee.

#### **Relevant sections of the National Law**

37. The relevant section of the National Law is section 39.

#### **Questions for consideration**

38. The Board is inviting general comments as well as feedback to the questions posed at [Attachment F](#)

## Registration standard: Limited registration for postgraduate training or supervised practice

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**Effective from:** <<date>>

**Review date:** <<date>>

This standard sets out the Board's requirements for an application for, and renewal of, limited registration for postgraduate training or supervised practice.

### Does this standard apply to me?

This standard applies to individuals who apply for:

- limited registration for postgraduate training or supervised practice, or
- renewal of limited registration for postgraduate training or supervised practice.

Medical practitioners who are qualified for general registration and/or specialist registration are not eligible for limited registration.

### What must I do?

#### When you apply for registration

To meet this registration standard, you must:

1. meet the requirements in the Board's approved registration standards for:
  - a. English language skills
  - b. recency of practice
  - c. professional indemnity insurance, and
  - d. continuing professional development.
2. comply with the Board's proof of identity policy as published on either the Board or AHPRA websites
3. provide evidence of having been awarded a primary degree in medicine and surgery, after completing an approved course of study at a medical school listed in the current International Medical Education Directory (IMED) (online only) of the Foundation for Advancement of International Medical Education and Research, or other publications approved by the Australian Medical Council and/or Board. An approved course of study means that you must be able to demonstrate that you have completed a medical curriculum of at least four

academic years (full-time equivalent), leading to an entitlement to registration in the country issuing the degree to practise clinical medicine

4. provide evidence that you have applied for, or have the results of, primary source verification of medical qualifications from the Educational Commission for Foreign Medical Graduates International Credentials Service (EICS)
5. provide evidence of successful completion of a medical internship or comparable. The Board may issue guidelines on what defines a comparable medical internship (there is one exemption to this requirement – see section on exemptions)
6. provide a curriculum vitae that meets the standard requirements that have been approved by the Board
7. provide details of past registration history
  - a. You are also required to arrange for the Board to receive certificates of good standing/ registration status (or equivalent type of certificate) from each registration authority that you have been registered with in the previous 10 years. The certificates should be supplied where possible directly to the Board from the relevant registration authority
8. satisfactorily complete a criminal history check in accordance with guidance issued from time to time by the Board or AHPRA – this is arranged by AHPRA
9. provide the following information from your proposed employer:
  - a. written confirmation of offer of employment
  - b. employer contact details
  - c. position description including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the position
  - d. name, qualifications and contact details of the proposed clinical supervisor/s and any secondary supervisors
  - e. a supervision plan, prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes details about the supervisor/s and will describe how supervision will be provided to ensure safe practice. It will also include written confirmation from the proposed supervisor that they agree to provide supervision and to comply with supervision obligations as required by the Board, and
  - f. details of the training that will meet the supervised practice or postgraduate training requirements of the applicant. This should include the purpose, anticipated duration, location, content and structure of training and the anticipated date of any examinations or assessments. The Board may issue guidance on training plans
10. provide evidence that confirms that you meet the eligibility criteria for one of the following pathways to registration:
  - a. standard pathway
  - b. specialist pathway – specialist recognition (comparability assessment), or
  - c. short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration (short-term training in a medical specialty pathway)
11. provide the results of a pre-employment structured clinical interview (PESCI) with a provider approved by the Board that confirms that you are suitable for the specific position. The Board will decide on a case-by-case basis whether a PESCI is necessary and this will depend on the nature of the position and the level of risk inherent to the position.

All documents submitted to support an application for limited registration must comply with the requirements for certifying documents as published on either the Board or AHPRA websites.

If you have previously been or are currently registered in a health profession in Australia under the National Scheme and have therefore provided information to a Board previously, some of the documentation requirements in this standard may be waived.

## How to demonstrate eligibility for one of the pathways to registration

### 1. *Standard pathway*

To be eligible for the **standard pathway**, you must provide evidence of successful completion of the Australian Medical Council Computer Adaptive Test (CAT) MCQ Examination.

### 2. *Specialist pathway - specialist recognition (comparability assessment)*

To be eligible for the **specialist pathway - specialist recognition (comparability assessment)**, you must provide verification from the relevant specialist college that has been accredited by the Australian Medical Council that your specialist qualifications have been assessed as either:

- a. substantially comparable; or
- b. partially comparable.

Evidence of eligibility for the pathways above can also be obtained by the Board directly from the secure Australian Medical Council portal.

### 3. *Short-term training in a medical specialty pathway for international medical graduates who are not qualified for general or specialist registration*

To be eligible for **short-term training in a medical specialty pathway**:

- a. **Specialists-in-training** must provide a statement from the overseas specialist college or body awarding the specialist qualification with whom you are a trainee in the country of training:
  - i. confirming your trainee status with the college/body
  - ii. outlining the content, structure and length of the training program
  - iii. confirming that you are not likely to be more than two years from completing your specialist training
  - iv. confirming that you have passed a basic specialist examination or satisfactorily completed substantial training (generally three or more years i.e. PGY 5); and
  - v. identifying the objectives of the training to be undertaken in Australia.

There is an exemption to some of these requirements for IMGs who are trainees of an Australian Medical Council accredited specialist medical college and have general scope registration with the Medical Council of New Zealand. See the section on exemptions.

- b. **Internationally qualified specialists** must provide a statement from the overseas specialist college or body awarding the specialist qualification that confirms your specialist qualification in the country of training
- c. You must confirm in writing that at this time you have no intention of making further applications for registration at the end of the specified training period (usually up to 24 months)
- d. You must provide verification from the relevant specialist medical college that has been accredited by the Australian Medical Council that:
  - i. you appear to be a genuine specialist-in-training or internationally qualified specialist, on the basis of a paper-based assessment of documents; and

- ii. the position that you have applied for is a genuine training position that is appropriate for your training requirements, taking into consideration your reported level of training and experience
- iii. there is adequate supervision and support for the your level of training and experience.

### **During the registration period**

You are required to comply with a range of requirements while you have limited registration for postgraduate training or supervised practice. These include:

1. compliance with the supervision plan approved by the Board
2. meeting the requirements in the training plan approved by the Board
3. compliance with the Board's registration standard for continuing professional development
4. ensuring that your supervisor/s provide regular reports to the Board regarding your work performance as required by the Board and as described in the Board's guidelines for the supervision of international medical graduates
5. performing satisfactorily in the position for which you were registered to practise
6. restricting your practice to the Board approved position/s, and
7. working towards meeting the requirements for general or specialist registration if you intend to apply for more than three renewals of registration.

If you do not maintain your employment in the Board approved position for which limited registration for postgraduate training or supervised practice was granted, you are unable to comply with the requirements on your practice and therefore cannot practise medicine until registration is granted for a new position.

### **When you apply for renewal**

When you apply to renew your limited registration, you must:

1. complete a renewal of registration application that includes the annual renewal statement in accordance with the provisions in the National Law, section 109
2. demonstrate compliance with any conditions or undertakings imposed on your registration or requirements on your registration set by the Board
3. submit work performance reports in accordance with the Board's guidelines for the supervision of international medical graduates
4. demonstrate that you have performed satisfactorily in the preceding registration period. This is usually demonstrated through the submission of work performance reports. The Board may also require you to complete an examination and/or assessment to demonstrate satisfactory performance, and
5. provide evidence that you are satisfactorily progressing towards general or specialist registration. You are exempt from this requirement if you will not apply for more than three renewals of registration.

### **Refusal to renew limited registration**

The Board may refuse to renew your registration if:

1. you are no longer in the position for which registration was granted by the Board
2. you do not comply with the Board approved supervised practice plan and the Board's requirements for supervision
3. you do not comply with the Board's registration standard for continuing professional development and any training plan approved by the Board, or
4. significant or multiple deficiencies are identified in your practice, by the Board.

## Period of limited registration

Up to 12 months of registration can be granted by the Board. The National Law states that limited registration may not be renewed more than three times. After three renewals of limited registration a medical practitioner who wishes to continue to practise will have to make a new application for registration.

## What happens if I don't meet this standard?

The National Law establishes possible consequences if you don't meet this standard, including that:

- registration standards, codes or guidelines may be used in disciplinary proceedings against health practitioners as evidence of what constitutes appropriate practice or conduct for the health profession (section 41 of the National Law), and
- a Board can refuse an application for registration or renewal of registration when an applicant does not meet a requirement in an approved registration standard for the profession (sections 82 and 112 of the National Law).

If a practitioner with limited registration breaches any of the requirements of this registration standard or any of the Board's registration standards, codes or guidelines, the Board may take action in respect of health, performance or conduct under Part 8 of the National Law. The Medical Council of New South Wales may take action under the relevant law in that jurisdiction.

## Applications for a change in circumstances

If you hold limited registration and you want to apply for another type of limited registration, you must make a new application.

If you hold limited registration for postgraduate training or supervised practice and you want to change your position (such as changing location, adding work sites, changing the scope of practice, applying for a new position with a new employer, etc) within the same type of registration (i.e. limited registration for postgraduate training or supervised practice), you must apply for approval of a change in circumstances.

Applications for a change in circumstances must be made on an approved form and you will be charged a fee. You must provide:

1. the following information from the proposed employer:
  - a. written confirmation of offer of employment
  - b. employer contact details
  - c. position description including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the positions
  - d. name, qualifications and contact details of the proposed clinical supervisor/s and any secondary supervisors
  - e. supervision plan, prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes:
    - i. details about the supervisor/s
    - ii. a description of how supervision will be provided to ensure safe practice
    - iii. written confirmation from the proposed supervisor that they agree to provide supervision and comply with supervision obligations as required by the Board
  - f. details of the training that will meet the supervised practice or postgraduate training requirements of the applicant. This should include the purpose, anticipated duration, location, content and structure of training and the anticipated date of any examinations or assessments. The Board may issue guidance on training plans

2. a work report from your previous supervisor
3. for trainees undertaking short-term training in a medical specialty, a letter from the relevant Australian Medical Council accredited specialist medical college confirming support for your change in circumstances and providing an assessment of your suitability for the training position based on the proposed changes.

A change in circumstances also includes a proposal to extend training beyond the period of specified training that you had confirmed with the Board at your initial application for registration. For example, you will need a letter from the Australian Medical Council accredited specialist college if you are undertaking short-term training in a medical specialty and you initially indicated that your duration of short-term training was 18 months but you now wish to extend that beyond 18 months.

4. satisfactory results of a PESCI with a provider approved by the Board that confirms that you are suitable for the specific position. The Board will decide on a case-by-case basis whether a PESCI is necessary and this will depend on the nature of the position and the level of risk inherent to the position.

### Are there exemptions to this standard?

There are exemptions to parts of this standard. There are no exemptions to the entire standard.

#### Medical internship or comparable

The Board may grant limited registration to an international medical graduate who has not previously completed a medical internship or comparable. The Board will only grant you limited registration so that you can complete an internship in an accredited internship position in Australia. For the Board to consider your application, you must also provide:

1. written confirmation from your proposed employer:
  - a. of an offer of employment in an accredited intern position
  - b. that that they are aware you have never completed a medical internship or comparable
  - c. that they will provide you with the appropriate support and supervision to ensure safe practice if you are granted registration
2. the employer contact details.

The Board will confirm that the position has been accredited as an intern position.

#### Short-term training in a medical specialty pathway – international medical graduates who are specialists-in-training in New Zealand

If you are a specialist-in-training and you are more than two years away from completing specialist training in your country, you may be exempt from the eligibility criteria for this pathway, if you:

1. are not qualified for general registration in Australia and
2. hold registration in a general scope with the Medical Council of New Zealand and
3. are an accredited trainee with an Australian Medical Council accredited specialist medical college in New Zealand.

You are required to provide a letter from the relevant Australian Medical Council accredited specialist college confirming your accredited trainee status and providing an assessment of your suitability for the training position in accordance with the Board's guidelines on this pathway.

## More information

Limited registration for postgraduate training or supervised practice may be granted to enable you to undertake a period of postgraduate training or supervised practice, or to undertake assessment or sit an examination approved by the Board. This type of registration would suit medical practitioners working towards qualifying for general or specialist registration or medical practitioners undertaking short-term specialist training.

The Board establishes requirements under this standard to ensure safe and competent practice for the period of limited registration. The Board will record the requirements that apply to a medical practitioner granted limited registration on the Register of Medical Practitioners pursuant to section 225(p) of the National Law.

The AHPRA website ([www.ahpra.gov.au](http://www.ahpra.gov.au)) includes more detailed information about the requirements for:

- providing proof of identity
- certifying documents, and
- what to include in a curriculum vitae.

## Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<DATE>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

## Definitions

**Limited registration** is a type of registration available to individuals who do not qualify for general or specialist registration. Each type of limited registration has a specific purpose which is defined in Part 7, Division 5 of the National Law. The four types of limited registration are:

- limited registration for postgraduate training or supervised practice
- limited registration for area of need
- limited registration for teaching or research, and
- limited registration in public interest.

See the registration standard relevant to the type of limited registration for an explanation of each.

**National Law** means the Health Practitioner Regulation National Law, as in force in each state and territory.

**National Scheme** means the National Registration and Accreditation Scheme.

**Pathways to registration** means the national process to assess the qualifications, training and experience of international medical graduates who are applying for registration. The assessment pathways that are relevant to this standard are the Standard Pathway, the Specialist Pathway – specialist recognition (comparability assessment) and the short term training in a medical specialty pathway.

**Supervision plan** means a plan that sets out the arrangements or proposed arrangements for clinical supervision of the medical practice of the applicant for registration or registered practitioner.

**Training plan** means a plan that sets out the education, training and professional development that the applicant will undertake and any assessment or examinations that they will attempt.

## Review

This registration standard will be reviewed from time to time as required. This will generally be at least every five years.

Last reviewed: [date]

This standard replaces the previously published registration standard from 1 July 2010.

## Registration standard: Limited registration for area of need

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**Effective from:** <<date>>

**Review date:** <<date>>

This standard sets out the Board's requirements for an application for, and renewal of, limited registration for area of need.

### Does this standard apply to me?

This standard applies to individuals who apply for:

- limited registration for area of need, or
- renewal of limited registration for area of need.

Medical practitioners who are qualified for general registration and/or specialist registration are not eligible for limited registration.

### What must I do?

#### When you apply for registration

To meet this registration standard, you must:

1. meet the requirements in the Board's approved registration standards for:
  - a. English language skills
  - b. recency of practice
  - c. professional indemnity insurance arrangements, and
  - d. continuing professional development
2. comply with the Board's proof of identity policy as published on either the Board or AHPRA websites
3. provide evidence of having been awarded a primary degree in medicine and surgery, after completing an approved course of study at a medical school listed in the current International Medical Education Directory (IMED) (online only) of the Foundation for Advancement of International Medical Education and Research, or other publications approved by the Australian Medical Council and/or the Board. An approved course of study means you must be able to demonstrate that you have completed a medical curriculum of at least four academic years (full time equivalent), leading to an entitlement to registration in the country issuing the degree to practise clinical medicine
4. provide evidence that you have applied for, or have the results of, primary source verification of medical qualifications from the Educational Commission for Foreign Medical Graduates International Credentials Service (EICS)

**Medical Board of Australia**

5. provide evidence of successful completion of a medical internship or comparable. The Board may issue guidelines on what defines a comparable medical internship
6. provide a curriculum vitae that meets the standard requirements that have been approved by the Board
7. provide details of past registration history
  - a. You are also required to arrange for the Board to receive certificates of good standing/registration status (or equivalent type of certificate) from each registration authority that you have been registered with in the previous ten years. The certificates should be supplied where possible directly to the Board from the relevant registration authority
8. satisfactorily complete a criminal history check in accordance with guidance issued from time to time by the Board or AHPRA – this is arranged by AHPRA
9. provide the following information from your proposed employer:
  - a. written confirmation of offer of employment
  - b. employer contact details
  - c. position description including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the position
  - d. name, qualifications and contact details of the proposed clinical supervisor/s and any secondary supervisors
  - e. a supervision plan, prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes details about the supervisor/s and will describe how supervision will be provided to ensure safe practice. It will also include written confirmation from the proposed supervisor that they agree to provide supervision and to comply with supervision obligations as required by the Board, and
  - f. a plan for continuing professional development activities
10. provide evidence of area of need declaration for the geographical area and/or type of health service, for which there is a need, from the responsible Minister for Health or delegate in the jurisdiction in which the designated area of need position is located
11. provide evidence that confirms that you meet the eligibility criteria for one of the following pathways to registration:
  - a. standard pathway, or
  - b. specialist pathway (area of need)
12. provide the results of a pre-employment structured clinical interview (PESCI) with a provider approved by the Board that confirms that you are suitable for the specific position. The Board will decide on a case-by-case basis whether a PESCI is necessary and this will depend on the nature of the position and the level of risk inherent to the position.

All documents submitted to support an application for limited registration must comply with the requirements for certifying documents as published on either the Board or AHPRA websites.

If you have previously been or are currently registered in a health profession in Australia under the National Scheme and have therefore provided information to a Board previously, some of the documentation requirements in this standard may be waived.

## How to demonstrate eligibility for one of the pathways to registration

### 1. *Standard pathway*

To be eligible for the **standard pathway**, you must provide evidence of successful completion of the Australian Medical Council Computer Adaptive Test (CAT) MCQ Examination.

### 2. *Specialist pathway – (area of need)*

To be eligible for the **specialist pathway (area of need)**, you must provide:

- a. verification from the relevant specialist college that has been accredited by the Australian Medical Council that your specialist qualifications have been assessed against the position description for the designated area of need position, and
- b. a letter of recommendation from the relevant specialist college and confirmation that you are suitable for the specific position, including any recommended limitations on the nature and extent of practice.

Evidence of eligibility for the pathways above can also be obtained by the Board directly from the secure Australian Medical Council portal.

## During the registration period

You are required to comply with a range of requirements while you have limited registration for area of need. These include:

1. compliance with the supervision plan approved by the Board
2. compliance with the Board's registration standard for continuing professional development
3. ensuring that your supervisor/s provide regular reports to the Board regarding your work performance as required by the Board and as described in the Board's guidelines for the supervision of international medical graduates
4. performing satisfactorily in the position for which you were registered to practise
5. restricting your practice to the Board approved position/s, and
6. working towards meeting the requirements for general or specialist registration if you intend to apply for more than three renewals of registration.

If you do not maintain your employment in the Board approved position for which limited registration for area of need was granted, you are unable to comply with the requirements on your practice and therefore cannot practise medicine until registration is granted for a new position.

## When you apply for renewal

When you apply to renew your limited registration, you must:

1. complete a renewal of registration application that includes the annual renewal statement in accordance with the provisions in the National Law, section 109
2. demonstrate compliance with any conditions or undertakings imposed on your registration or requirements on your registration set by the Board
3. submit work performance reports in accordance with the Board's guidelines for the supervision of international medical graduates
4. demonstrate that you have performed satisfactorily in the preceding registration period. This is usually demonstrated through the submission of work performance reports. The Board may also require you to complete an examination and/or assessment to demonstrate satisfactory performance
5. provide evidence that you are satisfactorily progressing towards meeting the requirements for general or specialist registration. You are exempt from this requirement if you will not apply for more than three renewals of registration, and

6. provide evidence of an area of need declaration for the geographical area and/or type of health service, for which there is a need, from the responsible Minister for Health or delegate in the jurisdiction in which the designated area of need position is located, if the area of need declaration provided at initial registration has expired or will expire during the next period of registration.

### **Refusal to renew limited registration**

The Board may refuse to renew your registration if:

1. you are no longer in the position for which registration was granted by the Board
2. you do not comply with the Board approved supervised practice plan and the Board's requirements for supervision
3. you do not comply with the Board's registration standard for continuing professional development
4. significant or multiple deficiencies are identified in your practice, by the Board, or
5. the area in which you are applying to practise is no longer deemed an area of need by the responsible Minister for Health or delegate.

### **Period of limited registration**

Up to 12 months of registration can be granted by the Board. The National Law states that limited registration may not be renewed more than three times. After three renewals of limited registration a medical practitioner who wishes to continue to practise will have to make a new application for registration.

### **What happens if I don't meet this standard?**

The National Law establishes possible consequences if you don't meet this standard, including that:

- the Board can impose conditions on your application for registration or renewal of registration or can refuse your application for registration or renewal of registration (sections 82 and 112 of the National Law), and
- registration standards, codes or guidelines may be used in disciplinary proceedings against you as evidence of what constitutes appropriate practice or conduct for medicine (section 41 of the National Law).

If a practitioner with limited registration breaches any of the requirements of this registration standard, or any of the Board's registration standards, codes or guidelines, the Board may take action in respect of health, performance or conduct under Part 8 of the National Law. The Medical Council of New South Wales may take action under the relevant law in that jurisdiction.

### **Applications for a change in circumstances**

If you hold limited registration and you want to apply for another type of limited registration, you must make a new application.

If you hold limited registration for area of need and you want to change your position (such as changing location, adding work sites, changing the scope of practice, applying for a new position with a new employer, etc) within the same type of registration (i.e. limited registration for area of need), you must apply for approval of a change in circumstances.

Applications for a change in circumstances must be made on an approved form and you will be charged a fee. You must provide:

1. the following information from the proposed employer:
  - a. written confirmation of offer of employment
  - b. employer contact details

- c. position description, including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the position/s
  - d. name, qualifications and contact details of the proposed clinical supervisor/s and any secondary supervisors
  - e. supervision plan, prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes:
    - i. details about the supervisor/s
    - ii. description of how supervision will be provided to ensure safe practice
    - iii. written confirmation from the proposed supervisor that they agree to provide supervision and comply with supervision obligations as required by the Board
  - f. details of the continuing professional development to be undertaken
2. a work report from your previous supervisor
  3. satisfactory results of a PESCI with a provider approved by the Board that confirms that you are suitable for the specific position. The Board will decide on a case-by-case basis whether a PESCI is necessary and this will depend on the nature of the position and the level of risk inherent to the position, and
  4. evidence of an area of need declaration for the geographical area and/or type of health service, for which there is a need, from the responsible Minister for Health or delegate in the jurisdiction in which the designated area of need position is located.

### More information

Limited registration for an area of need may be granted to enable an individual to practise a health profession in an area of need decided by the responsible Minister for Health. The Minister for Health in each participating jurisdiction is responsible under section 67(5) of the National Law for determining whether there is an area of need for health services in the jurisdiction or part of the jurisdiction.

Providing a declaration of an area of need does not, on its own, entitle you to registration. Each application will be decided on its individual merits and on whether you meet the requirements of this registration standard.

The Board establishes requirements under this standard to ensure safe and competent practice for the period of limited registration. The Board will record the requirements that apply to a medical practitioner granted limited registration on the Register of Medical Practitioners pursuant to section 225(p) of the National Law.

The AHPRA website ([www.ahpra.gov.au](http://www.ahpra.gov.au)) includes more detailed information about the requirements for:

- providing proof of identity
- certifying documents, and
- what to include in a curriculum vitae.

### Qualifying for specialist registration

Confirmation from the relevant specialist college that you are suitable for a specific area of need position does not qualify you for specialist registration. If you are seeking to qualify for specialist registration, you must also have your qualifications assessed as 'substantially comparable' or 'partially comparable' by the relevant specialist college under the specialist pathway – specialist recognition (comparability assessment) process and complete any additional requirements specified by the specialist college to qualify for specialist registration.

For more information see the Board's approved registration standard for specialist registration available on the Board's website.

## General practice

Due to the comprehensive nature of general practice, if you are applying to work in a general practice position, you are expected to have at least three years equivalent experience working in general practice or primary care.

When making a decision on whether to grant limited registration for area of need, the Board will take into consideration the specialist college's area of need assessment and your level of experience in general practice or primary care.

## Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<date>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

## Definitions

**Limited registration** is a type of registration available to individuals who do not qualify for general or specialist registration. Each type of limited registration has a specific purpose which is defined in Part 7, Division 5 of the National Law. The four types of limited registration are:

- limited registration postgraduate training or supervised practice
- limited registration for area of need
- limited registration for teaching or research, and
- limited registration in public interest.

See the registration standard relevant to the type of limited registration for an explanation of each.

**National Law** means the Health Practitioner Regulation National Law, as in force in each state and territory.

**National Scheme** means the National Registration and Accreditation Scheme.

**Pathways to registration** means the national process to assess the qualifications, training and experience of international medical graduates who are applying for registration. The assessment pathways that are relevant to this standard are the Standard Pathway and the Specialist Pathway (area of need).

**Supervision plan** means a plan that sets out the arrangements or proposed arrangements for clinical supervision of the medical practice of the applicant for registration or registered practitioner.

## Review

This registration standard will be reviewed from time to time as required. This will generally be at least every five years.

Last reviewed: [date]

This standard replaces the previously published registration standard from 1 July 2010.

## Registration standard: Limited registration in public interest

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**Effective from:** <<date>>

**Review date:** <<date>>

This standard sets out the Board's requirements for an application for, and renewal of, limited registration in the public interest.

### Does this standard apply to me?

This standard applies to individuals who apply for:

- limited registration in public interest, or
- renewal of limited registration in the public interest.

Medical practitioners who are qualified for general registration and/or specialist registration are not eligible for limited registration.

### What must I do?

#### When you apply for registration

To meet this registration standard, you must:

1. meet the requirements in the Board's approved registration standards for:
  - a. English language skills
  - b. recency of practice
  - c. professional indemnity insurance arrangements, and
  - d. continuing professional development.
2. comply with the Board's proof of identity policy as published on either the Board or AHPRA websites
3. provide evidence of having been awarded a primary degree in medicine and surgery, after completing an approved course of study at a medical school listed in the current International Medical Education Directory (IMED) (online only) of the Foundation for Advancement of International Medical Education and Research, or other publications approved by the Australian Medical Council and/or the Board. An approved course of study means that you must be able to demonstrate that you have completed a medical curriculum of at least four academic years (full time equivalent), leading to an entitlement to registration in the country issuing the degree to practise clinical medicine

4. provide evidence that you have applied for, or have the results of, primary source verification of medical qualifications from the Educational Commission for Foreign Medical Graduates International Credentials Service (EICS)
5. provide evidence of successful completion of a medical internship or comparable. The Board may issue guidelines on what defines a comparable medical internship
6. provide a curriculum vitae that meets the standard requirements that have been approved by the Board
7. provide details of past registration history
  - a. You are also required to arrange for the Board to receive certificates of good standing/ registration status (or equivalent type of certificate) from each registration authority that you have been registered with in the previous 10 years. The certificates should be supplied where possible directly to the Board from the relevant registration authority
8. satisfactorily complete a criminal history check in accordance with guidance issued from time to time by the Board or AHPRA – this is arranged by AHPRA
9. provide the following information from your proposed employer or sponsor (if not in an employment relationship):
  - a. written confirmation of offer of employment or other engagement
  - b. employer or sponsor contact details
  - c. position description including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the position
  - d. name, qualifications and contact details of the proposed clinical supervisor/s and any secondary supervisors
  - e. if the period of registration is for more than four weeks, a supervision plan prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes details about the supervisor/s and will describe how supervision will be provided to ensure safe practice. It will also include written confirmation from the proposed supervisor that they agree to provide supervision and to comply with supervision obligations as required by the Board.

If the period of registration is for less than four weeks, supervision is required but a detailed supervision plan does not need to be submitted.
  - f. a plan for professional development activities that is relevant to the clinical practice of the medical practitioner, if registration is for more than four weeks, and
10. detail why it is in the public interest to register you.

All documents submitted to support an application for limited registration must comply with the requirements for certifying documents as published on either the Board or AHPRA websites.

If you have previously been or are currently registered in a health profession in Australia under the National Scheme and have therefore provided information to a Board previously, some of the documentation requirements in this standard may be waived.

## During the registration period

You are required to comply with a range of requirements while you have limited registration in the public interest. These include:

1. compliance with the supervision plan approved by the Board
2. compliance with the Board's registration standard for continuing professional development
3. ensuring that your supervisor/s provide regular reports to the Board regarding your work performance as required by the Board and as described in the Board's guidelines for the supervision of international medical graduates
4. performing satisfactorily in the position for which you were registered to practise
5. restricting your practice to the Board approved position/s, and
6. working towards meeting the requirements for general or specialist registration if you intend to apply for more than three renewals of registration.

If you do not maintain your employment in the Board approved position for which limited registration in public interest was granted, you are unable to comply with the requirements on your practice and therefore cannot practise medicine until registration is granted for a new position.

## When you apply for renewal

When you apply to renew your limited registration, you must:

1. complete a renewal of registration application that includes the annual renewal statement in accordance with the provisions in the National Law, section 109
2. demonstrate compliance with any conditions or undertakings imposed on your registration or requirements on your registration set by the Board
3. submit work performance reports in accordance with the Board's guidelines for the supervision of international medical graduates
4. demonstrate that you have performed satisfactorily in the preceding registration period. This is usually demonstrated through the submission of work performance reports. The Board may also require you to complete an examination and/or assessment to demonstrate satisfactory performance
5. demonstrate that there is an ongoing 'public interest' reason to renew your registration, and
6. provide evidence that you are satisfactorily progressing towards general or specialist registration. You are exempt from this requirement if you will not apply for more than three renewals of registration.

## Refusal to renew limited registration

The Board may refuse to renew your registration if:

1. you are no longer in the position for which registration was granted by the Board
2. you do not comply with the Board approved supervised practice plan and the Board's requirements for supervision
3. you do not comply with the Board's registration standard for continuing professional development
4. significant or multiple deficiencies are identified in your practice by the Board, or
5. your circumstances have changed and there is no 'public interest' reason to register you under this type of registration.

## Period of limited registration

Up to 12 months of registration can be granted by the Board. The National Law states that limited registration may not be renewed more than three times. After three renewals of limited registration a medical practitioner who wishes to continue to practise will have to make a new application for registration.

## What happens if I don't meet this standard?

The National Law establishes possible consequences if you don't meet this standard, including that:

- the Board can impose conditions on your application for registration or renewal of registration or can refuse your application for registration or renewal of registration (sections 82 and 112 of the National Law), and
- registration standards, codes or guidelines may be used in disciplinary proceedings against you as evidence of what constitutes appropriate practice or conduct for medicine (section 41 of the National Law).

If a practitioner with limited registration breaches any of the requirements of this registration standard, or any of the Board's registration standards, codes or guidelines, the Board may take action in respect of health, performance or conduct under Part 8 of the National Law. The Medical Council of New South Wales may take action under the relevant law in that jurisdiction.

## Applications for a change in circumstances

If you hold limited registration and you want to apply for another type of limited registration, you must make a new application.

If you hold limited registration in the public interest and you want to change your position (such as changing location, adding work sites, changing the scope of practice, applying for a new position with a new employer, etc) within the same type of registration (i.e. limited registration in the public interest), you must apply for approval of a change in circumstances.

Applications for a change in circumstances must be made on an approved form and you will be charged a fee. You must provide:

1. the following information from the proposed employer:
  - a. written confirmation of offer of employment or other engagement
  - b. employer or sponsor contact details
  - c. position description, including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the position
  - d. name, qualifications and contact details of the proposed clinical supervisor/s and any secondary supervisors
  - e. if the total period of registration is for more than four weeks, a supervision plan prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes:
    - i. details about the supervisor/s
    - ii. a description of how supervision will be provided to ensure safe practice, and
    - iii. written confirmation from the proposed supervisor that they agree to provide supervision and comply with supervision obligations as required by the Board
  - f. details of a professional development plan that is relevant to the clinical practice of the medical practitioner, if registration is for more than four weeks
2. a work report from your previous supervisor

3. an explanation as to why it is in the 'public interest' to approve the change in the circumstances.

### More information

Limited registration in the public interest is usually a short-term type of registration. It is used infrequently and would be expected to be granted for a period of weeks rather than years. It is unlikely that renewal of registration would be necessary.

The Board determines whether or not it is in the public interest to register the practitioner. Examples of where it might be in the public interest to register a medical practitioner includes an unexpected situation where a natural disaster has occurred or a pandemic has been declared.

Limited registration in the public interest is not an alternative to limited registration for an area of need. It must not be used to circumvent the requirement for Ministerial declaration of an area of need.

This is not an appropriate type of registration for medical practitioners who wish to practise long-term in Australia.

The Board establishes requirements under this standard to ensure safe and competent practice for the period of limited registration. The Board will record the requirements that apply to a medical practitioner granted limited registration on the Register of Medical Practitioners pursuant to section 225(p) of the National Law.

The AHPRA website ([www.ahpra.gov.au](http://www.ahpra.gov.au)) includes more detailed information about the requirements for:

- providing proof of identity
- certifying documents, and
- what to include in a curriculum vitae.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<DATE>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Definitions

**Limited registration** is a type of registration available to individuals who do not qualify for general or specialist registration. Each type of limited registration has a specific purpose which is defined in Part 7, Division 5 of the National Law. The four types of limited registration are:

- limited registration postgraduate training or supervised practice
- limited registration for area of need
- limited registration for teaching or research, and
- limited registration in public interest.

See the registration standard relevant to the type of limited registration for an explanation of each.

**National Law** means the Health Practitioner Regulation National Law, as in force in each state and territory.

**National Scheme** means the National Registration and Accreditation Scheme.

**Supervision plan** means a plan that sets out the arrangements or proposed arrangements for clinical supervision of the medical practice of the applicant for registration or registered practitioner.

## Review

This registration standard will be reviewed from time to time as required. This will generally be at least every five years.

Last reviewed: [date]

This standard replaces the previously published registration standard from 1 July 2010.

### Registration standard: Limited registration for teaching or research

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**Effective from:** <<date>>

**Review date:** <<date>>

This standard sets out the Board's requirements for an application for, and renewal of, limited registration for teaching or research.

#### Does this standard apply to me?

This standard applies to individuals who apply for:

- limited registration for teaching or research, or
- renewal of limited registration for teaching or research.

Medical practitioners who are qualified for general registration and/or specialist registration are not eligible for limited registration.

#### What must I do?

##### When you apply for registration

To meet this registration standard, you must:

1. meet the requirements in the Board's approved registration standards for:
  - a. English language skills
  - b. recency of practice
  - c. professional indemnity insurance, and
  - d. continuing professional development.
2. comply with the Board's proof of identity policy as published on either the Board or AHPRA websites
3. provide evidence of having been awarded a primary degree in medicine and surgery, after completing an approved course of study at a medical school listed in the current International Medical Education Directory (IMED) (online only) of the Foundation for Advancement of International Medical Education and Research, or other publications approved by the Australian Medical Council and/or Board. An approved course of study means you must be able to demonstrate that you have completed a medical curriculum of at least four academic

years (full time equivalent), leading to an entitlement to registration in the country issuing the degree to practise clinical medicine

4. provide evidence that you have applied for, or have the results of, primary source verification of medical qualifications from the Educational Commission for Foreign Medical Graduates International Credentials Service (EICS)
5. provide evidence of successful completion of a medical internship or comparable. The Board may issue guidelines on what defines a comparable medical internship
6. provide a curriculum vitae that meets the standard requirements that have been approved by the Board
7. provide details of past registration history
  - a. You are also required to arrange for the Board to receive certificates of good standing/ registration status (or equivalent type of certificate) from each registration authority that you have been registered with in the previous 10 years. The certificates should be supplied where possible directly to the Board from the relevant registration authority.
8. satisfactorily complete a criminal history check in accordance with guidance issued from time to time by the Board or AHPRA – this is arranged by AHPRA
9. provide the following information from your proposed employer or sponsor (if not employed):
  - a. written confirmation of offer of employment/engagement
  - b. employer or sponsor contact details
  - c. position description including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the positions. This should also contain details of the teaching or research activities and any clinical practice that will be undertaken
  - d. name, qualifications and contact details of the proposed clinical supervisor/s if clinical practice will be undertaken
  - e. a supervision plan if clinical practice will be undertaken. The supervision plan should be prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes details about the supervisor/s and will describe how supervision will be provided to ensure safe practice. It will also include written confirmation from the proposed supervisor that they agree to provide supervision and to comply with supervision obligations as required by the Board  

If you are applying for registration for less than four weeks to demonstrate a procedure or participate in a workshop, supervision is required but a detailed supervision plan does not need to be submitted.
  - f. details of a professional development plan that is relevant to your teaching or research activities and any clinical practice, if registration is for more than four weeks, and
  - g. if you will be demonstrating a procedure or participating in a workshop:
    - i. details of the clinical activities that you will be doing
    - ii. the location/s of clinical activities,
    - iii. the organisation that will auspice any demonstration or workshop, and
    - iv. signed confirmation from your proposed supervisor that they will take on the responsibility for the ongoing care of your patients when you are no longer practising in Australia. Where your proposed supervisor cannot provide ongoing care, provide signed confirmation from a local registered medical

practitioner that they will take on the responsibility for the ongoing care of your patients when you are no longer practising in Australia.

All documents submitted to support an application for limited registration must comply with the requirements for certifying documents as published on either the Board or AHPRA websites.

If you have previously been or are currently registered in a health profession in Australia under the National Scheme and have therefore provided information to a Board previously, some of the documentation requirements in this standard may be waived.

### **During the registration period**

You are required to comply with a range of requirements while you have limited registration for teaching or research. These include:

1. compliance with the supervision plan approved by the Board, if you are undertaking clinical practice
2. compliance with the Board's registration standard for continuing professional development (excludes practitioners demonstrating procedures or participating in workshops who have been granted registration for no more than four weeks)
3. ensuring that your supervisor/s provide regular reports to the Board regarding your work performance as required by the Board and as described in the Board's guidelines for the supervision of international medical graduates, if you are undertaking clinical practice
4. performing satisfactorily in the position for which you were registered to practise
5. restricting your practice to the Board approved position/s, and
6. working towards meeting the requirements for general or specialist registration if you intend to apply for more than three renewals of registration.

If you do not maintain your employment in the Board approved position for which limited registration for teaching or research was granted, you are unable to comply with the requirements on your practice and therefore cannot practise medicine until registration is granted for a new position.

### **When you apply for renewal**

When you apply to renew your limited registration, you must:

1. complete a renewal of registration application that includes the annual renewal statement in accordance with the provisions in the National Law, section 109
2. demonstrate compliance with any conditions or undertakings imposed on your registration or requirements on your registration set by the Board
3. submit work performance reports in accordance with the Board's guidelines for the supervision of international medical graduates
4. demonstrate that you have performed satisfactorily in the preceding registration period. This is usually demonstrated through the submission of work performance reports. The Board may also require you to complete an examination and/or assessment to demonstrate satisfactory performance, and
5. provide evidence that you are satisfactorily progressing towards general or specialist registration. You are exempt from this requirement if you will not apply for more than three renewals of registration.

## Refusal to renew limited registration

The Board may refuse to renew your registration if:

1. you are no longer in the position for which registration was granted by the Board
2. you do not comply with the Board approved supervised practice plan and the Board's requirements for supervision, if you are undertaking clinical practice
3. you do not comply with the Board's registration standard for continuing professional development (excludes practitioners demonstrating procedures or participating in workshops who have been granted registration for no more than four weeks), or
4. significant or multiple deficiencies are identified in your practice, by the Board.

## Period of limited registration

Up to 12 months of registration can be granted by the Board. The National Law states that limited registration may not be renewed more than three times. After three renewals of limited registration a medical practitioner who wishes to continue to practise will have to make a new application for registration.

## What happens if I don't meet this standard?

The National Law establishes possible consequences if you don't meet this standard, including that:

- registration standards, codes or guidelines may be used in disciplinary proceedings against health practitioners as evidence of what constitutes appropriate practice or conduct for the health profession (section 41 of the National Law), and
- a Board can refuse an application for registration or renewal of registration when an applicant does not meet a requirement in an approved registration standard for the profession (sections 82 and 112 of the National Law).

If a practitioner with limited registration breaches any of the requirements of this registration standard, or any of the Board's registration standards, codes or guidelines, the Board may take action in respect of health, performance or conduct under Part 8 of the National Law. The Medical Council of New South Wales may take action under the relevant law in that jurisdiction.

## Applications for a change in circumstances

If you hold limited registration and you want to apply for another type of limited registration, you must make a new application.

If you hold limited registration for teaching or research and you want to change your position (such as changing location, adding work sites, changing the scope of practice, applying for a new position with a new employer, etc) within the same type of registration (i.e. limited registration for teaching or research), you must apply for approval of a change in circumstances.

Applications for a change in circumstances must be made on an approved form and you will be charged a fee. You must provide:

1. the following information from the proposed employer or sponsor (if not employed):
  - a. written confirmation of offer of employment/engagement
  - b. employer or sponsor contact details
  - c. position description, including key selection criteria addressing clinical responsibilities and qualifications and experience required to meet the requirements of the positions. This should also contain details of the teaching or research activities and any clinical practice that will be undertaken
  - d. name, qualifications and contact details of the proposed clinical supervisor/s if clinical practice will be undertaken

- e. supervision plan if clinical practice will be undertaken, prepared in accordance with the Board's guidelines for the supervision of international medical graduates. The supervision plan includes:
    - i. details about the supervisor/s
    - ii. a description of how supervision will be provided to ensure safe practice, and
    - iii. written confirmation from the proposed supervisor that they agree to provide supervision and comply with supervision obligations as required by the Board
  - f. details of a professional development plan that is relevant to your teaching or research activities and any clinical practice
  - g. if you will be demonstrating a procedure or participating in a workshop, details of the clinical activities that you will be doing, the location/s of clinical activities and the organisation that will auspice any demonstration or workshop
2. a work report from your previous supervisor.

### More information

Limited registration for teaching or research is an appropriate type of registration for international medical graduates who will be practising in a teaching or research position. Clinical practice is allowed if it is directly related to teaching or research. However, more than 50% of the practice must be in teaching or research.

This is an appropriate type of registration for medical practitioners who are demonstrating a particular procedure or leading a workshop as they are teaching.

Medical practitioners who are wishing to practise in Australia for more than three renewals of registration should complete the requirements for general or specialist registration.

The Board establishes requirements under this standard to ensure safe and competent practice for the period of limited registration. The Board will record the requirements that apply to a medical practitioner granted limited registration on the Register of Medical Practitioners pursuant to section 225(p) of the National Law.

The AHPRA website ([www.ahpra.gov.au](http://www.ahpra.gov.au)) includes more detailed information about the requirements for:

- providing proof of identity
- certifying documents, and
- what to include in a curriculum vitae.

### Authority

This registration standard was approved by the Australian Health Workforce Ministerial Council on <<DATE>>.

Registration standards are developed under section 38 of the National Law and are subject to wide ranging consultation.

### Definitions

**Limited registration** is a type of registration available to individuals who do not qualify for general or specialist registration. Each type of limited registration has a specific purpose which is defined in Part 7, Division 5 of the National Law. The four types of limited registration are:

- limited registration postgraduate training or supervised practice
- limited registration for area of need
- limited registration for teaching or research, and
- limited registration in public interest.

See the registration standard relevant to the type of limited registration for an explanation of each.

*Registration standard: Limited registration for teaching or research*

**National Law** means the Health Practitioner Regulation National Law, as in force in each state and territory.

**National Scheme** means the National Registration and Accreditation Scheme.

**Supervision plan** means a plan that sets out the arrangements or proposed arrangements for clinical supervision of the medical practice of the applicant for registration or registered practitioner.

### **Review**

This registration standard will be reviewed from time to time as required. This will generally be at least every five years.

Last reviewed: [date]

This standard replaces the previously published registration standard from 1 July 2010.

## Attachment E

### Draft guideline

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April 2014

## Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

### 1. Background

Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration (short-term training in medical specialty pathway) is a pathway that allows internationally qualified specialists or international specialists-in-training to undertake short-term training in Australia without having to complete the Australian Medical Council (AMC) examination or to have a full comparability assessment by the relevant specialist college.

The short-term training in a medical specialty pathway is for individuals with specialist qualifications or for specialists-in-training who are close to completing specialist training in another country<sup>3</sup> and who want to undertake short-term training in a particular medical specialty area in Australia. In this context, 'short-term' is usually considered to be up to 24 months.

The short-term training in a medical specialty pathway also promotes opportunities for exchange fellowships.

Medical practitioners eligible for the short-term training in a medical specialty pathway can apply for limited registration for postgraduate training or supervised practice. Medical practitioners with this type of registration must comply with the supervision and training requirements on registration approved by the Medical Board of Australia (the Board).

The short-term training in a medical specialty pathway does not lead to general or specialist registration. Medical practitioners who intend to practise in Australia for more than two years need to meet the requirements for the standard pathway (AMC certificate) or specialist pathway (either specialist recognition or area of need).

### 2. Purpose of this guideline

This guideline has been developed to inform international medical graduates and specialist colleges about the requirements for registration for medical practitioners who are eligible for the short-term training in a medical specialty pathway. It also describes the role of the specialist colleges which advise the Board about the suitability of the training position for the specific applicant for registration.

This guideline should be read in conjunction with the Board's registration standard for limited registration for postgraduate training or supervised practice which sets out the requirements for this type of registration and the specific requirements for the short-term training in a medical specialty pathway.

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<sup>3</sup> There is one exemption to the requirement to be no more than two years away from completing specialist training – see the section on exemptions.

### 3. Eligibility for the short-term training in a medical specialty pathway

The short-term training in a medical speciality pathway is available to international medical graduates who are applying for limited registration for postgraduate training or supervised practice AND

- a. are recognised as qualified specialists in another country of training (outside Australia) OR
- b. are genuine specialists-in-training in another country (outside Australia) and who:
  - are likely to be no more than two years away from completing their specialist training, and
  - have passed a basic specialist examination or have satisfactorily completed substantial training (generally 3 or more years ie PGY 5).

### 4. The role of specialist colleges - assessing the suitability of the training position for the specific applicant

The specialist medical colleges have an important role in advising the Board whether:

- an individual appears to be a genuine specialist-in-training or internationally qualified specialist, on the basis of a paper-based assessment of documents
- the position that the individual has applied for is a genuine training position that is appropriate for that person's training requirements, taking into consideration their reported level of training and experience, and
- there is adequate supervision and support for the individual's level of training and experience. This assessment will take into consideration the purpose and principles of supervision as set out in the Board's guidelines for the supervision of international medical graduates (IMGs).

The specialist medical college assessment does not:

- assess the competence of the individual applying for registration
- decide whether or not to register a medical practitioner. This is the responsibility of the Board
- assess the specialist IMG's training and experience for comparability against the training and experience of an Australian trained specialist currently entering the workforce.

For a specialist college to undertake this assessment, you must apply to the specialist college on a form approved by the Board. This form requires the following information:

1. a training plan providing details of the purpose, anticipated duration, location, content and structure of training and the anticipated date of any examinations or assessments
2. a position description for the proposed training position
3. a curriculum vitae
4. a statement from the overseas specialist college or body awarding the specialist qualification with whom you:
  - a. are a specialist-in-training:
    - i. confirming your trainee status with the college/body
    - ii. outlining the content, structure and length of the overseas training program
    - iii. confirming that you are not likely to be more than two years from completing your specialist training
    - iv. confirming that you have passed a basic specialist examination or satisfactorily completed substantial training (generally three or more years i.e. PGY 5) and
    - v. identifying the objectives of the training to be undertaken in Australia
  - b. are a specialist, confirming your specialist qualification in the country of training
5. written confirmation from you that, at this time you have no intention of making further applications for registration at the end of the specified training period.

The specialist colleges advise the Board on the outcome of their assessment by completing the section available on the form submitted by you. The completed form is provided directly to the Board by the specialist college and a copy is also provided to you (or your authorised nominee).

See attachment 1 for an overview of the process for applying for registration.

## 5. Renewal of limited registration postgraduate training or supervised practice

Under the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), limited registration may be renewed up to three times. After this, you must make a new application for limited registration and meet any registration standards which are current at the time.

Although practitioners in this pathway should not need to make more than one application for renewal of registration (as it is for up to 24 months), you should be aware that renewal of limited registration for postgraduate training or supervised practice is subject to meeting a number of requirements including providing evidence that you are satisfactorily progressing towards general or specialist registration.

Practitioners are usually exempt from this requirement if they will not apply for more than three renewals of registration.

As training in this pathway is for a defined period, after which you have undertaken that you will no longer be seeking medical registration in Australia, practitioners in this pathway are not required to demonstrate satisfactory progress towards general or specialist registration.

However, if circumstances arise that require you to apply for registration beyond 24 months, you:

1. must provide a letter from the relevant AMC accredited specialist college confirming support for the longer period of training and providing an assessment of your suitability for the training position in accordance with this guideline, and
2. may be required to demonstrate progress towards general or specialist registration, which will require you to apply for the competent authority pathway, the standard pathway or the specialist pathway (specialist recognition).

The Board will consider each application on a case by case basis.

## 6. Application for a change in circumstances

Limited registration for postgraduate training or supervised practice is granted for a specified purpose. The Board imposes requirements on registration as defined in its approved registration standard. The Board's registration standard for limited registration for postgraduate training or supervised practice requires medical practitioners to apply to the Board when they propose to change the circumstances under which they were granted limited registration for postgraduate training or supervised practice.

A change in circumstances includes a proposal to:

1. change the designated training position. This may include changing locations, adding additional work sites, changing the scope of practice or applying for a new position with a new employer. (**Note:** practitioners who are no longer employed in their designated training position are unable to comply with the requirements on registration and therefore cannot practise medicine)
2. change the approved training plan, or
3. extend training beyond the period of specified training that you had confirmed with the Board at your initial application for registration.

An application for a change in circumstances must be made on a form approved by the Board and include a letter from the specialist medical college confirming support for your change in circumstances and providing an assessment of your suitability for the training position based on the proposed changes.

## 7. Exemption to the eligibility for the short-term training in a medical specialty pathway

### Background

Most of the AMC accredited specialist colleges provide training for medical practitioners in Australia and New Zealand. The colleges may accept for specialist training IMGs who are not qualified for general registration in Australia but who have registration in a general scope in New Zealand. From time to time, the New Zealand trainees are required to do a rotation in Australia.

This exemption allows this cohort of practitioners to be granted limited registration, if they are more than two years away from completing their specialist training.

### Requirements

If you are a specialist-in-training and you are more than two years away from completing specialist training, you may be exempt from the eligibility criteria for this pathway, if you:

1. are not qualified for general registration in Australia and
2. hold registration in a general scope with the Medical Council of New Zealand and
3. are an accredited trainee with an AMC accredited specialist college in New Zealand.

You are required to provide a letter from the relevant AMC accredited specialist college confirming your accredited trainee status and providing an assessment of your suitability for the training position in accordance with the Board's guidelines on this pathway.

## 8. Definitions

**Genuine specialist-in-training** means an applicant who:

- has commenced a specialist training program in a country outside of Australia that is delivered by a recognised/accredited body for specialist training. The training program includes formal assessment processes and mechanisms for measuring learning outcomes and
- is not likely to be more than two years away from completing their specialist training, and has passed a basic specialist examination or has satisfactorily completed substantial training (generally 3 or more years ie PGY 5) or
- holds registration in a general scope with the Medical Council of New Zealand but is not qualified for general registration in Australia and is an accredited trainee with an AMC accredited specialist college in New Zealand.

**Internationally qualified specialist** means the applicant is recognised as a qualified specialist by a recognised/accredited overseas authority responsible for awarding specialist qualifications and/or the qualified specialist is recognised by the overseas registering authority as a specialist in a country outside of Australia. The applicant is also seeking to up-skill their specialist qualifications in a particular specialist area and is not seeking specialist recognition in Australia.

**Genuine training position** means that the Australian training position that the applicant has applied for is a training position accredited by a specialist college accredited by the AMC or is a formal structured training position which consists of formal assessment processes and mechanisms for measuring learning outcomes. The training position is not primarily a service position.

### Implementation Date and Review

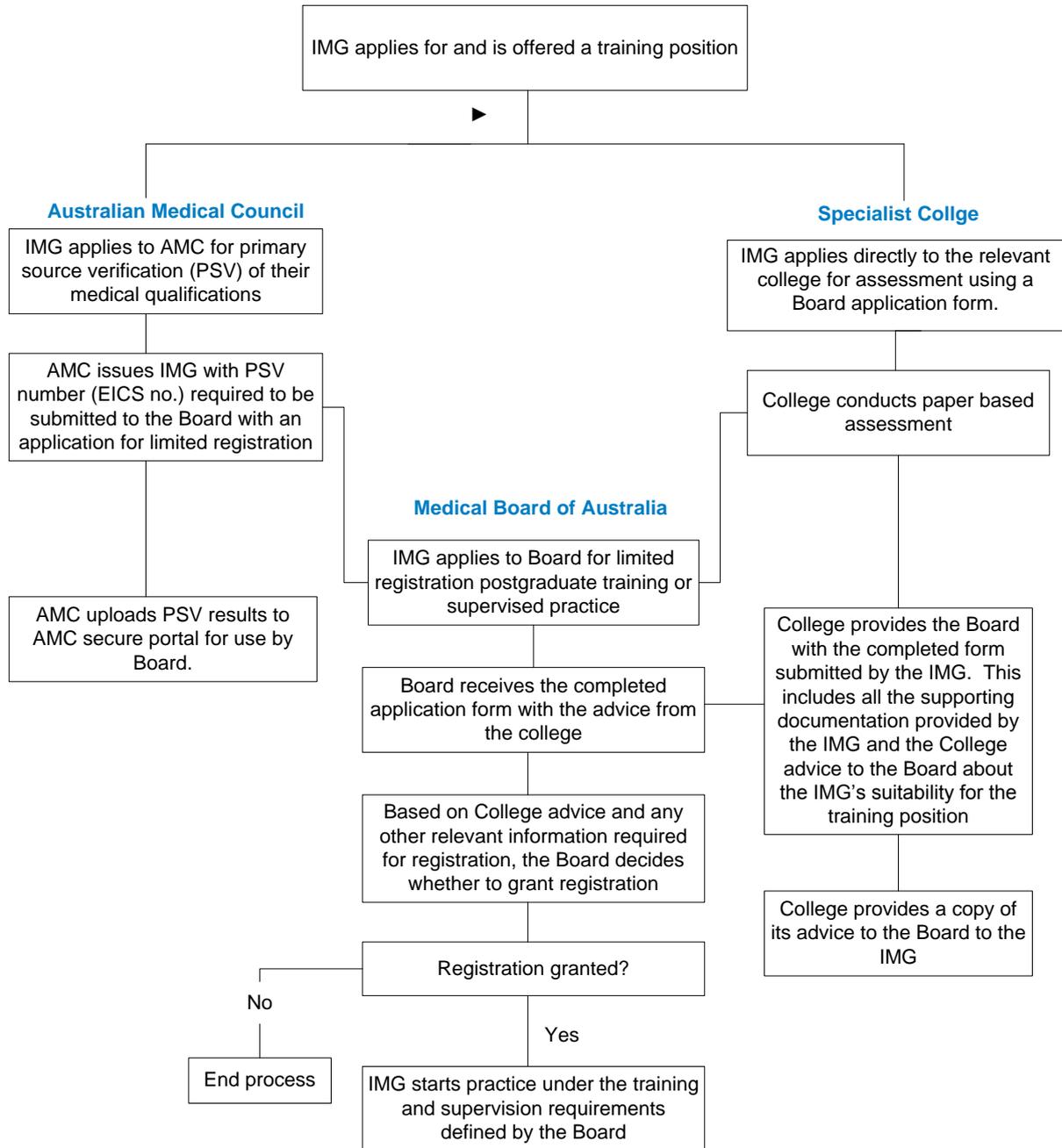
These guidelines will take effect on <date>.

The Board will review these guidelines from time to time.

**Attachment 1**

Short-term training in a medical specialty pathway

**Proposed pathway flow chart**



## Attachment F

Questions for stakeholders on the draft guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

### Change of pathway name

It is proposed to change the name of the pathway from the “specialist pathway – short term training” to the “short term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration”. It will be referred to as ‘short-term training in a medical specialty pathway’.

The purpose of the name change is to ensure that short term training in a medical specialty is distinguished from the specialist pathway – specialist recognition, and to clarify that it does not lead to an approved qualification required for specialist registration. Specialist international medical graduates (IMGs) who seek to qualify for specialist registration must apply under the specialist pathway – specialist recognition.

**Question 1:** Do you support the proposed name change? If not, do you propose an alternative name for this pathway?

### Eligibility for the short-term training in a medical specialty pathway

The eligibility criteria as defined in section 3 of the draft guideline is also contained in the Board’s revised version of the standard for limited registration for postgraduate training or supervised practice. Overseas recognised specialists or specialists-in-training who do not meet the eligibility criteria are not eligible for registration.

**Question 2:** Are the eligibility criteria for this pathway appropriate? If not, in what way should they be changed?

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An exemption for IMGs with general scope registration in New Zealand who are accredited college trainees is proposed so that these trainees can complete part of their training in Australia if necessary. There have been circumstances when the training in Australia has been earlier than in the last 2 years of their training and that has made their registration problematic.

It should be noted that these practitioners will be qualified for specialist registration once they are awarded fellowship.

**Question 3:** Is it reasonable to have an exemption for IMGs with general scope registration in New Zealand who are accredited college trainees?

### The role of the specialist colleges

The role of the specialist colleges and the role of the Board are defined under section 4 of the draft guideline. The colleges have an advisory role. Although the Board considers the college advice it does not exclusively rely on this advice. The college advice forms part of the information the Board relies on when deciding whether to grant registration.

The Board assesses every application for registration as the decision on whether to register a practitioner rests with the Board.

**Question 4:** Is the role of the specialist medical colleges as described in the draft guideline appropriate. If not, what changes do you propose?

## The process for approaching specialist colleges

Currently, applicants apply directly to the specialist college for assessment on a Board application form.

**Question 5:** *Is the process for applying directly to the College on a Board application form appropriate? Can you propose a more streamlined process?*

## Information for the specialist colleges

Section 4 of the draft guideline defines the information that is to be provided to the specialist colleges by the IMG for assessment.

**Question 6:** *Is the information that the IMG is required to provide to the college sufficient for colleges to advise the Board about the IMG's suitability for the short-term training in a medical specialty pathway? If not, what additional information should be requested?*

## Renewing registration beyond 24 months

The draft guideline and the related draft registration standard confirm that short-term training is usually for a period of up to 24 months. The duration of short-term training is based on the previous decisions made by the COAG IMG Assessment Technical Committee.

Under the National Law, limited registration may be renewed up to three times (i.e. up to a maximum of four years). After this, the applicant must make a new application for limited registration and meet any registration standards which are current at the time.

Under the revised registration standard for limited registration for postgraduate training or supervised practice, renewal of limited registration for postgraduate training or supervised practice is subject to the practitioner meeting specified requirements including demonstrating progress towards general or specialist registration if they will apply for renewal of registration more than three times.

As this pathway is for overseas specialists or specialists-in-training wishing to undertake a short period of specialist or advanced training in Australia, applicants in this pathway should not need to renew registration beyond 24 months. Therefore they are not required to demonstrate satisfactory progress towards general or specialist registration.

However, the draft guideline proposes that should circumstances arise that require an IMG to apply for registration beyond 24 months, the IMG

- a. *must provide a letter from the relevant AMC accredited specialist college confirming support for the longer period of training and providing an assessment of the applicant's suitability for the training position in accordance with the Board's guidelines on this pathway, and*
- b. *may be required to demonstrate satisfactory progress towards general or specialist registration, which will require them to apply for the competent authority pathway, the standard pathway or the specialist pathway (specialist recognition).*

Each application will be considered on a case by case basis.

This approach aims to clarify the purpose of this pathway (short-term training) and is consistent with the requirements of renewal of registration for all other IMGs planning to stay in Australia longer term. The approach also allows for flexibility where the Board and the relevant college support a longer period of training for genuine trainees.

**Question 7:** *Is this approach appropriate for practitioners in this pathway who apply to renew registration beyond 24 months? If not, why not?*

## Specialist pathway – comparability assessment

International medical graduates with international specialist qualifications are eligible to apply for the specialist pathway – specialist recognition (comparability assessment).

Overseas specialists-in-training are not eligible for the specialist pathway - specialist recognition (comparability assessment).

**Question 8:** *Some medical practitioners undertaking short-term training in a medical specialty may decide to apply to the specialist college for specialist recognition. Are there any barriers to this?*

## Change in circumstances

Currently the specialist colleges do not have a role beyond initial assessment conducted for the Board. The draft guideline under section 6 proposes that the specialist colleges also provide advice to the Board on the suitability of training when the medical practitioner proposes to:

1. change their designated training position. This may include changing locations, adding additional work sites, changing the scope of practice or applying for a new position with a new employer. (Note: practitioners who are no longer employed in their designated training position are unable to comply with the requirements on registration and therefore cannot practise medicine)
2. change the approved training plan, or
3. extend training beyond the period of specified training that the applicant had confirmed with the Board at the initial application for registration.

A proposal from a medical practitioner for a change in circumstances could arise at any time during the registration period or at renewal of registration. The requirements for making an application for a change in circumstances are also contained in the Board's revised registration standard for limited registration for postgraduate training or supervised practice.

**Question 9:** *Is it appropriate for the specialist colleges to provide advice to the Board about the suitability of training for a medical practitioner in the circumstances described above?*

## Definitions

The grounds for advising the Board on whether an applicant is suitable for a training position are supported by definitions for **genuine specialist-in-training**, **internationally qualified specialist** and **genuine training program**.

**Question 10:** *Are the definitions under section 8 appropriate? If not, what changes do you propose?*

# Attachment G

## Statement of assessment

Board's statement of assessment against AHPRA's *Procedures for development of registration standards* and *COAG principles for best practice regulation*

*Registration standards for limited registration*

*Draft guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration*

The Australian Health Practitioner Regulation Agency (AHPRA) has *Procedures for the Development of Registration Standards* which are available at: [www.ahpra.gov.au](http://www.ahpra.gov.au)

These procedures have been developed by AHPRA in accordance with section 25 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice.

Below is the Boards' assessment of its proposals for its draft revised registration standards and draft guideline against the three elements outlined in the AHPRA procedures.

### 1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law

#### Board assessment

The Board considers that the draft revised registration standards for the four types of limited registration and the draft guideline meet the objectives and guiding principles of the National Law.

The draft revised registration standards for the four types of limited registration, if approved, will balance the National Law objectives of providing for the protection of the public and facilitating access to health services provided by medical practitioners. The draft revised registration standards will ensure that medical practitioners with limited registration are appropriately supervised and practise in positions that are appropriate for their current level of training, knowledge and skills.

The draft guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration is linked to the draft revised registration standard for postgraduate training or supervised practice and provides additional information on the requirements for this pathway.

The draft revised registration standards and draft guideline also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way.

### 2. The consultation requirements of the National Law are met

#### Board assessment

The National Law requires wide-ranging consultation on proposed registration standards, codes and guidelines. The National Law also requires the Board to consult other boards on matters of shared interest.

The Board is ensuring that there is public exposure of its proposals and the opportunity for public comment by undertaking an eight week public consultation process. The process will include the publication of the consultation paper (and attachments) on its website.

The Board has drawn this paper to the attention of key stakeholders including the other National Boards.

The Board will take into account the feedback it receives when finalising its draft revised registration standards for submission to the Ministerial Council for approval and when finalising and approving its draft guideline.

### **3. The proposal takes into account the COAG Principles for Best Practice Regulation**

#### **Board assessment**

In developing the draft revised registration standards and draft guideline for consultation, the Board has taken into account the Council of Australian Governments (COAG) *Principles for Best Practice Regulation*.

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures.

#### **COAG Principles**

##### **A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public**

#### **Board assessment**

The Board considers that its proposals are the best options for achieving the stated purposes. The draft revised registration standards for the four types of limited registration and the draft guideline do not propose substantial changes to current requirements for limited registration. Therefore the impact of the proposals is similar to the requirements of existing registration standards.

The Board considers that the draft revised registration standards and draft guideline would have a low impact on the medical profession. These low impacts are significantly outweighed by the benefits of protecting the public, facilitating access to health services provided by medical practitioners and providing clearer, simpler requirements, in the public interest.

##### **B. Whether the proposal results in an unnecessary restriction of competition among health practitioners**

#### **Board assessment**

The Board considered whether its proposals could result in an unnecessary restriction of competition among health practitioners. The proposals are not expected to impact on the current levels of competition among health practitioners.

##### **C. Whether the proposal results in an unnecessary restriction of consumer choice**

#### **Board assessment**

The Board considers that the draft revised registration standards and draft guideline will support consumer choice by facilitating access to health services provided by medical practitioners within a framework that ensures public protection.

##### **D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved**

#### **Board assessment**

The Board considered the overall costs of the draft revised registration standards and draft guideline to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits that the revised draft registration standards and draft guideline contribute to the National Scheme.

Subject to stakeholder feedback on the proposed revisions and if approved by the Ministerial Council, the draft revised registration standards for the four types of limited registration should have

only minimal impact on the costs to applicants as the proposals do not substantially change current requirements for each type of limited registration.

Subject to stakeholder feedback on the draft guideline and if approved by the Board, there should also be minimal impact from the draft guideline. The draft guideline complements the draft revised registration standard for postgraduate training or supervised practice and is based on current requirements.

**E. Whether the requirements are clearly stated using ‘plain language’ to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants**

**Board assessment**

The Board considers the draft revised registration standards and draft guideline have been written in plain English that will help stakeholders to understand the requirements of the standards and the guideline. The Board has also changed the structure of the draft revised registration standards and reviewed the wording to make the standards easier to understand.

**F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time**

**Board assessment**

If approved, the Board will review the draft revised registration standards at least every five years and the draft guideline at the same time, including an assessment against the objectives and guiding principles in the National Law and the COAG principles for best practice regulation.

However, the Board may choose to review the standards or the draft guideline earlier, if it is necessary to ensure the continued relevance and workability of these documents.