



## Submission to the Medical Board of Australia: July 2014

### Review of registration standards for limited registration and proposed guideline for short-term training in a medical speciality for IMGs

The Australasian College for Emergency Medicine (ACEM) welcomes the opportunity to provide feedback to the Medical Board of Australia (MBA, the Board) on the *Review of registration standards for limited registration* as well as *proposed guidelines for short-term training in a medical speciality for international medical graduates who are not qualified for general or specialist registration*.

ACEM is a not-for-profit organisation responsible for the training and ongoing education of emergency physicians, and for the advancement of professional standards in emergency medicine, in Australia and New Zealand. ACEM, as the peak professional organisation for emergency medicine in Australasia, has a vital interest in ensuring the highest standards of emergency medical care are maintained for all patients across Australasia. ACEM supports the Board's review of the current medical registration standards relating to limited registration for (i) postgraduate training or supervised practice (ii) area of need (iii) in the public interest and (iv) teaching or research.

Following review of the draft revised standards and proposed guideline, ACEM provides the following comments.

#### **Attachment A – Registration standard: limited registration for postgraduate training or supervised practice**

ACEM suggests that the following suggested content be considered for addition to the revised standards:

- To Section 3(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: (p.13):
  - *“It is expected that the training position will allow the internationally qualified specialist to gain experience that would not be available in their own country of origin or training.”*
- Section 3(d)(ii) You must provide verification from the relevant specialist medical college that has been accredited by the Australian Medical Council that (p.14):
  - *“The short-term training in a medical specialty pathway does not lead to general or specialist registration. Medical practitioners who intend to practice in Australia for more than two years must meet the requirements for the Standard Pathway (AMC Certificate) or Specialist Pathway (either specialist recognition or area of need)”*

- Section 3 - During the Registration Period, item 7 (p.14), which states that registrants are required to comply with a range of requirements while holding limited registration for postgraduate training or supervised practice including “working towards meeting the requirements for general or specialist registration if intending to apply for more than three renewals of registration”:
  - In relation to registrants on the “Short-term training in a medical specialty pathway”, ACEM considers the above statement contradictory to other sections of the standard, which specify the requirement to confirm that there will be no further application for registration, following the completion of the specified training. ACEM suggests that in order to avoid confusion, the Board consider specifying the requirements ‘During the registration period’ separately for each pathway.
  - ACEM is also concerned regarding the implication that medical specialist colleges will endorse requests for limited registration beyond the three renewal periods; ACEM therefore recommends that the Board provide additional information regarding specific verification registrants are required to obtain from the respective medical college, in relation to an extension of registration beyond 3 renewals.

#### **Attachment B – Registration standard: limited registration for area of need**

ACEM is concerned with the operation of eligibility requirements for this registration standard. In particular, the requirement to provide:

1. *‘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*
2. *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’ (p. 21)*

ACEM is concerned that this requirement is being circumvented by some sponsors and applicants. In the instance where ACEM has not recognised the applicant’s qualification as substantially comparable to Fellowship of ACEM, and subsequently not supported the Area of Need (AON) application, ACEM is aware that some applicants have been appointed as specialists at hospitals and been registered to practice via alternative MBA pathways. ACEM strongly believes that it should be involved in the assessment of all AON applicants for an emergency medicine and AON positions, prior any appointment, and that to ensure community safety, the recommendations/support provided by ACEM should not be ignored.

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

ACEM supports the Board’s proposed change to the name of the pathway from ‘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’.

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

ACEM considers this process appropriate. However ACEM members have reported instances of sponsors/employers advising applicants that the applicant is solely responsible for preparing the application and the College's role is to locate necessary documentation. ACEM therefore recommends that the Board clearly outline as a requirement that applications are prepared and submitted jointly by the sponsor/employer and the applicant.

- 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? If not, what additional information should be requested?

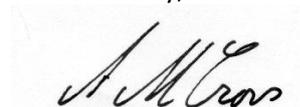
In addition to information currently requested by the Board, ACEM also requests that applicants submit a registration status/certificate of good standing from their respective Board equivalent in their country of training origin.

- Question 7 – Is the approach (to renewing registration beyond 24 months) appropriate for practitioners in this pathway who apply to renew registration beyond 24 months? If not, why not?

As specified in the draft guideline *"...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."* ACEM remains concerned that this pathway may be utilised as a loophole by both specialists in training and overseas trained specialists as a way of facilitating entry into the Australian system without proceeding via the normal pathways. As outlined in the draft revised standard, this is not the purpose of the pathway, which is designed to provide opportunities for short-term training. ACEM therefore recommends that this issue is clarified both within the guidelines and the relevant registration standard.

Thank you for the opportunity to provide feedback to Board in its public consultation on the *Review of registration standards for limited registration* as well as *proposed guidelines for short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration*. ACEM looks forward to receiving further updates from the Board regarding the progress and implementation of the revised standards. If you require any clarification or further information, please do not hesitate to contact the ACEM Director of Policy and Research, Dr Andrew Gosbell (03) 9320 0444 or [andrew.gosbell@acem.org.au](mailto:andrew.gosbell@acem.org.au).

Yours sincerely,



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PRESIDENT