

10 July 2014

Medical Board of Australia  
GPO Box 9958  
Melbourne Vic 3001

**Public consultation – Limited registration standards and draft guidelines on short term training in a medical specialty pathway**

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

The Australian College of Rural and Remote Medicine (ACRRM) wish to thank the Medical Board of Australia (MBA) for the opportunity to provide feedback on the revised *Limited registration and draft guidelines on short term training in a medical specialist pathway* during this the public consultation phase.

The Colleges provides comment of the following proposed changes for your consideration:

***Review of the registration standards for the four types of limited registration***

***Limited registration for postgraduate training or supervised practice***

Overall ACRRM supports the content and structure of the draft revised registration standards but believe the current wording relating to PESCI requirements is unclear and should be either written to be clearer or further explained in process terms.

The reference to PESCI's in attachment A pages 2 and 6 states "....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".

AHPRA has required candidates for all position in the general practice setting both for Standard Pathway and Competent Authority Pathways to undertake a PESCI. Our understanding is that this is a requirement given these positions are in areas of need/district of workforce shortage hence are higher on the risk matrix.

Currently when a candidate is either preparing for or have applied for registration in a general practice position they will book to sit a PESCI. The wording above would suggest the process will be; that they make application to AHPRA; AHPRA will then undertake a preliminary review of the application and then advise the applicant if a PESCI is going to be required.

As the current proposed wording has the potential to confuse, ACRRM would recommend that this section is either rewritten to state clearly which position will require (or will not require) a PESCI or alternatively explain the decision making process in regard to PESCI and the point within the process when notification as to the requirement to sit a PESCI (or not) will be made. This will make it clearer to the IMG as to if they will be required to undertake

a PESCI given position and at what point in the process they will need to undertake this assessment should it be required.

*Limited registration for area of need*

Overall ACRRM supports the content and structure of the draft revised standards but notes that the same wording in reference to PESCI as noted above is also used in the document on pages 2 and 5. We recommend that this wording is also changed in this document to be aligned to that which has been recommended for inclusion in 'Registration standards: Limited registration for postgraduate training and supervised practice'.

*Limited registration in public interest*

Overall ACRRM supports the content and structure of the proposed standard and believe it to be comprehensive.

*Limited registration for teaching and research*

Overall ACRRM supports the content and structure of the proposed standard and believes it to be comprehensive.

***Draft Guidelines: Short term training in a medical specialty pathway for IMG's***

ACRRM congratulates the MBA on the development of draft guidelines for this pathway. ACRRM agrees that the lack of guidelines has contributed to confusion regarding this pathway and the roles and responsibilities of the Board and the specialist medical colleges. ACRRM has read the draft guidelines and wishes to confirm support for the content and structure of the guidelines overall.

As requested by the MBA, ACRRM provides the following comment in regard to the 10 questions posed:

1. Name change for pathway – The proposed name is a little long and the College notes that the pathway will be referred to as 'short term training in a medical specialist pathway'. We suggest at this is adopted as the name.
2. Appropriateness of the eligibility criteria – Agree the eligibility criteria proposed is appropriate.
3. Exemption for New Zealand trainees is not applicable to general practice.
4. Appropriateness of the role of the specialist medical colleges – Agree with the role as described.
5. Application – ACRRM agrees that the process of applying directly to the College on the Board application form and for the College then to complete and return to MBA. ACRRM considers this will streamline the process.
6. Information required – ACRRM believes that the information the IMG is required to provide the college should be sufficient to enable advice to the Board to be developed. This may be an area that is monitored and if Colleges find it necessary to

request significant additional information then the guidelines may need to be changes.

7. Renewal of registration beyond 24 months – This is an area that will need close monitoring but the proposed process in the draft guidelines appear responsible.
8. Short term trainees making application for specialist recognition - They could only apply if they are able to meet all the Colleges requirements for recognition.
9. Change in circumstances – ACRRM agrees with the draft guidelines under section 6 which proposes that specialist colleges also provide advice to the Board in regard to a proposal from a medical practitioner for a change in circumstances.
10. Definitions – ACRRM supports the definitions are set out in the draft guidelines which define *genuine specialist in training, internationally qualified specialists and genuine training program*.

I am happy to discuss the above and should you wish please do not hesitate to contact me.

Yours sincerely

Di Wyatt  
Strategic Program Manager/ IMG Program Manager