



PRESIDENT

Dr Genevieve Goulding
MBBS (UNSW), FANZCA, FAICD

AUSTRALIAN AND NEW ZEALAND
COLLEGE OF ANAESTHETISTS

ABN 82 055 042 852

*Advancing anaesthesia,
improving patient care*

June 30, 2014

Dr Joanna Flynn
Chair
Medical Board of Australia
GPO Box 9958
Melbourne VIC 3001

Email: c/- medboardconsultation@ahpra.gov.au

Dear Dr Flynn

Australian and New Zealand College of Anaesthetists
**Medical Board of Australia Consultation – Limited registration standards and draft guideline
on short-term training in a medical specialty pathway**

As you would be aware the Australian and New Zealand College of Anaesthetists (ANZCA), which includes the Faculty of Pain Medicine, is committed to high standards of clinical practice in the fields of anaesthesia and pain medicine. ANZCA is the education and training body responsible for the postgraduate medical training programs and continuing professional development in anaesthesia and pain medicine for Australia, New Zealand and parts of Asia.

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

As requested please find responses to the questions outlined in Appendix F below:

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

The proposed name change is not user friendly, although it does describe the pathway accurately. One danger of such a lengthy name is that people will simply continue to describe the pathway as “short term training” which will not alleviate the confusion. While we do not have an alternative proposal, a more concise option would be more appropriate.

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

Yes the current eligibility criteria are appropriate. It is appropriate that candidates are in the later part of their training and have passed at least one exam or equivalent.

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

Yes, this is not as relevant to ANZCA but there are some training programs operating on a trans-Tasman basis and to make proper use of the rotations New Zealand based IMG trainees need to be treated the same as the New Zealand and Australian medical graduate trainees.

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

Yes, the Medical Board of Australia must be the final decision maker, as they will have access to more information about the applicant, and the Colleges will advise solely about those matters of which they have knowledge. In some instances information available to the MBA may not be volunteered to the College. There may be a discrepancy in regards to written confirmation that the specialist-in-training has no intention of making further applications for registration at the end of the specified training period. The IMGS process allows an applicant to be a "specialist-in-training" and IMGS frequently are not intending to return to their country of origin. Potentially this request could be clearly indicated as part of the application form rather than as a separate declaration.

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

The difference in requirements between state Boards poses significant challenges. Some Boards require forms to be sent in hard copy with all the supporting documents, some require the form and documents to be emailed. A consistent approach would be preferred, particularly if all Boards would accept the forms by email and had a designated email address for this (similar to the AMC).

Contacting the state Boards with questions can be time consuming. The College has previously requested that there be a designated person in each state to respond to relevant queries rather than have all queries go through the call centre. This has not progressed.

Finally there is a lack of clarity around whether an IMG has to apply for an extension of registration each year and if this will require a new AAMC-30 form or a letter from the College or no input from the College. This lack of clarity frequently causes delays while the IMG tries to sort out what exactly is required.

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?

Yes, so long as all required information is provided.

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

Yes, we agree that the process appears appropriate.

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?*

No, the College is able to assess and process these applications in a timely manner, however this does seem contradictory to the intention of IMGs not seeking additional registration after two years.

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?*

Yes this is strongly supported, initial approval is provided for a specified position only and not all positions will be suitable for some applicants.

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

Yes, the definitions provided are appropriate.

Limited registration for postgraduate training or supervised practice

The proposed revised standard appears appropriate; the College supports its adoption and has no additional comments.

Limited registration for area of need

“Item 2 *Specialist pathway – (area of need) part b*” states that a letter of recommendation from the relevant specialist college confirming suitability is required. The College currently provides this assessment.

As per “Item 2 *When you apply for renewal part 5*” upon renewal of limited registration for an area of need position the College is currently requested to provide evidence that the candidate is satisfactorily progressing to meet the relevant registration requirements. In addition, the College is currently also requested to confirm the candidate is still suitable for the relevant position.

While it is clearly stated in the new standard that a college recommendation is required for initial registration it is not clear whether a further recommendation from the College is required to renew registration. As there is potential for hospital environments and/or an applicant’s situation to change between the time of initial registration and subsequent renewal of the registration it is important that advice is sought from the colleges as to the ongoing suitability of the applicant for the position.

Limited registration for teaching or research

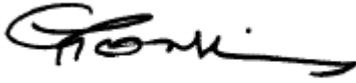
The proposed revised standard appears appropriate; the College supports its adoption and has no additional comments.

Limited registration in public interest

The proposed revised standard appears appropriate; the College supports its adoption and has no additional comments.

Thank you for the opportunity to comment. Should you require any further information, please contact Jonathon Kruger, General Manager Policy via email jkruger@anzca.edu.au or telephone +61 3 8517 5341. We look forward to the outcomes of the current consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Genevieve', with a long horizontal flourish extending to the right.

Dr Genevieve Goulding
President