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To: [medboardconsultation](#)
Subject: Consultation on Registration Standards
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Submission to Medical Board of Australia – Consultation on registration Standards – Limited Registration

Background and Declaration:

I am an IMG practicing in Australia since 2012. I currently hold both General and Specialist registration with AHPRA. Throughout my journey I had been on two different types of Limited Registration (Postgraduate training or supervised practice and Area of Need). As I am interested in different registration pathways and IMG movements in different countries, I have created a network of colleagues and was informally following up on their progress and learning about different issues. As I have already achieved both general and specialist registration, I do not have any conflict of interest in providing this consultation and my aim is to help in improving and standardizing assessments of IMGs.

Limited Registration for Postgraduate Training or Supervised Practice:

As the name implies, you would expect that the doctor will be working in a training position. In reality I have personally known many IMGs who were / are working as Specialists under this type of registration. Some of them started working as specialists without even going through a Specialist assessment by the relevant specialist college (examples available on request). The concern is that this is a loop hole in the system that allows IMGs to work as Specialists in the public sector bypassing the specialist college completely. With the introduction of the competent Authority pathway, some of these IMGs obtain General registration and can permanently practice in Australia as Specialists without having to apply for Specialist registration. The private sector is more regulated as section 19AA of the Health Insurance Act prohibits IMGs who do not hold Specialist Qualifications from accessing Medicare benefit. In my opinion, this is a major issue that needs addressing. There should be a requirement to have at least Partial Comparability assessment by the Specialist College before an IMG is able to work in a Specialist position under this type of registration.

Application for Change of Circumstances:

It is hard to provide an opinion on this without reflecting on my own experience. I had applied for a change of circumstances to my initial registration to enable me to work as a Specialist under supervision. After 6 weeks, I was advised by AHPRA that the change is significant and I need college support. The Specialist College would not give support unless the position is deemed an Area of Need and a Separate assessment is done. This resulted in five months delay in changing to my new position, which was deemed as an

area of needs, meaning five months of unmet health need in regional Victoria. Surprisingly, other IMGs coming from other services within the state were given approval for change in circumstances without AHPRA requesting College support. There were no specific guidance regarding when to submit change of circumstances and when to submit a new application. There are also no guidance on the role of Specialist Colleges in these applications. I feel this area requires a lot of clarification from AHPRA and the role of Specialist Colleges in approving a change of circumstances to a Specialist Position should be defined.

Area of Need Limited Registration:

I am pleased to see the active work of AHPRA, AMC and Specialist Colleges in implementing the recommendations of the “Lost in the Labyrinth” report. My understanding and perhaps this is the understanding of most Australian is that registration standards and regulation of the profession is standard across Australia. I had initially undergone an assessment by the College for an AON position in NSW and the college was supportive of me working in that position after a thorough assessment of qualifications and experience. I was later offered a matching position (same level and same speciality) in my own work place. AHPRA and the College insisted on a new assessment before supporting this new position. This resulted in significant delays in meeting the health needs of this AON position. I cannot think of a scenario where a Specialist IMG is safe to work as a Specialist in one AON but not another in the same speciality. We all believe that medical practice in Australia has the same standards and regulations all over the different states. In my opinion, an IMG should undergo one AON assessment that should apply for all AON positions across Australia. This will provide the following:

- Significant streamlining of the process and standardization of Aon assessments
- Significant reduction in time taken to fill AON positions by IMG resulting in improved access to specialist care in regional and remote areas
- Ability for IMGs to undergo AON assessment before arriving in Australia which will mean that hospitals can offer positions for eligible candidates rather than wasting time awaiting for a candidate who is later deemed in eligible by the Specialist college and starting the whole process of interviewing and offering again
- Flexibility for IMGs to move in between different Areas of Need within the same speciality

Renewal of Limited Registration and the Four Years Limit:

The national law requires a registrant to make a new application after four years on Limited Registration. It is not clear whether a registrant can make a new application under the same type of registration for the same job or there is a requirement to change the position or registration type. It is also not clear what are the requirements for the new application, bearing in mind that the registrant would have been practicing

in Australia for at least four years and AHPRA would have a detailed record of Qualifications, assessments, employment history and more importantly at least five structured supervisor reports. This is a particularly pressing issue as AHPRA will be celebrating its 5th birthday in two weeks.

Short-term training in a medical specialty pathway:

While I have not been under this type of registration before, I will try to answer some of the questions asked in the consultation:

- In my opinion, it is entirely appropriate for the candidate to apply directly to the Specialist college
- I cannot see any problem in allowing registrants under this Pathway to apply for Specialist assessment later on if they decide to remain in Australia. In fact, many countries accredit Australian training and it could be the case with some candidates that they obtain specialist qualifications in their home country following a period of training in Australia
- In my opinion, it is appropriate to request the specialist college input if the registrant seeks registration beyond 24 months. This pathway is meant for specific purpose and training and 24 months is more than enough to achieve such training or for a candidate to decide whether they want to practice in Australia for longer and start progressing towards standard or specialist pathways.

Yours Sincerely

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