

11 July 2014

Dr Joanne Katsoris
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Dear Dr Katsoris

Re: Review of limited registration standards and draft guideline

The Royal Australian College of General Practitioners (RACGP) thanks the Medical Board of Australia for the opportunity to provide comment on the:

- Limited registration standards for:
 - post-graduate training and supervised practice
 - area of need
 - teaching and research
 - public interest.
- Draft guideline – *Short term training in a medical specialty for IMGs who are not qualified for general or specialist registration.*

As you are aware, the RACGP is the specialty medical college for general practice in Australia, responsible for defining the nature of the discipline, setting and maintaining the curriculum and standards for education, training and quality general practice and for supporting GPs in their pursuit of clinical excellence and community service.

Limited registration standards

The RACGP has no comments to make in relation to the limited registration standards for:

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

Draft guideline – Short term training in a medical specialty

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

The RACGP recognises the improved clarity derived from changing the term “specialist pathway — short term training” to “short-term training in a medical speciality” and supports this change.

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

These eligibility criteria are appropriate.

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

Yes. This exemption is reasonable.

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 role of specialist medical colleges as described is appropriate.

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

Yes. This is appropriate.

6. *Is the information that the IMG is required to provide to the colleges 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?*

This information is all relevant. However, training posts need to meet standards and be accredited according to the standards of the relevant colleges. Hence, point 2, under section 4 which reads "a position description for the proposed training position" should be replaced with "a position description for the proposed training position, including how any training accreditation requirements are met."

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

Yes, this is 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?*

Yes. For general practice, there are currently no training pathways that could accommodate a medical practitioner in this situation.

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?*

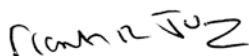
Yes. The RACGP provides a risk assessment according to the level of competence, supervision and the location. A change of circumstances could result in a change in the requirements for the level of supervision and result in patient safety issues.

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

Yes.

If you have any questions regarding this advice please contact Dr Ronald McCoy, Senior Medical Educator on (03) 8699 0527 or at ron.mccoy@racgp.org.au

Yours sincerely



Associate Professor Frank Jones
Vice President