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Dear Dr Katsoris

**Re: Consultation Limited Registration Standards and Draft Guideline on short-term training
in a medical specialty for international medical graduates who are not qualified
for general or specialist registration**

Thank you for the opportunity to provide feedback on the review of registration standards and draft guideline. The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) is pleased to provide answers to questions as requested and to also further comment in specific areas.

Questions for Consideration

1. From your perspective, how are the current registration standards working?

The RANZCOG has no issue with the standards currently, however welcomes the review and enhancements planned.

2. Is the content and structure of the draft revised registration standards helpful, clear, relevant and more workable than the current standards?

Yes; the content and structure appears workable.

3. Is there any content that needs to be changed or deleted in the draft revised registration standards?

Several small changes are suggested in certain areas as specified later in this correspondence.

4. Is there anything missing that needs to be added to the draft revised registration standards?

There do not appear to be significant omissions in the revised registration standards.

5. It is proposed that the draft revised standards are reviewed every five years or earlier if required. Is this reasonable?

This timeframe is reasonable.

6. Do you have any other comments on the draft revised registration standards?

As specified later in this document.

Comments on Specific Documents

Background

- 26 The Board is proposing to change the name of the “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”. It will be referred to as ‘short-term training in a medical specialty pathway’.

27 The purpose of the name change is to ensure that short term training in a medical specialty is distinguished from the specialist pathway – specialist recognition, and to clarify that it does not lead to an approved qualification required for specialist registration...

The short version of the name, which includes the word 'pathway', implies progress toward recognition, which is not the purpose of short term training. Using the term 'pathway' in the name does not assist to distinguish short term training from the specialist pathway.

28 This pathway allows internationally qualified specialists or international specialists-in-training to undertake training in a medical specialty in Australia for a short period, usually up to 24 months.

Renewals in the pathway can be extended to 48 months. This inconsistency may cause confusion.

In all, the clarification of requirements and processes is commended.

Preferred Option

RANZCOG supports Option 2; the proposed revised standard.

Registration Standard: Limited registration for postgraduate training or supervised practice

RANZCOG concurs with proposed standard, however would suggest the addition of a fifth point in relation to the circumstances when the Board may refuse to renew registration. Specifically:

The Board may refuse to renew your registration if:

1. you are no longer in the position for which registration was granted by the Board
2. you do not comply with the Board approved supervised practice plan and the Board's requirements for supervision
3. you do not comply with the Board's registration standard for continuing professional development and any training plan approved by the Board, or
4. significant or multiple deficiencies are identified in your practice, by the Board, or
5. your maximum period of renewal has expired.

Registration Standard: Limited registration for area of need

During the registration period

You are required to comply with a range of requirements while you have limited registration for area of need. These include:

...

- 3 ensuring that your supervisor/s provide regular reports to the Board regarding your work performance as required by the Board and as described in the Board's guidelines for the supervision of international medical graduates

...

Currently, RANZCOG receives supervisors' reports for Area of Need placements and forwards these to AHPRA. The College understands from this requirement that this is no longer an expectation of the reporting process.

Refusal to renew limited registration

The Board may refuse to renew your registration if:

1. you are no longer in the position for which registration was granted by the Board

2. you do not comply with the Board approved supervised practice plan and the Board's requirements for supervision
3. you do not comply with the Board's registration standard for continuing professional development
4. significant or multiple deficiencies are identified in your practice, by the Board, or
5. the area in which you are applying to practice is no longer deemed an area of need by the responsible Minister for Health or delegate.

As previously, the RANZCOG suggests the addition of a sixth point:

6. you have exceeded the maximum number of renewals.

Registration Standard: Limited registration in public interest

No further comments.

Registration Standard: Limited registration for teaching or research

No further comments

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

RANZCOG believes the advice provided in the section titled 'Renewal of limited registration postgraduate training or supervised practice' is confusing as to the time limitations (including renewals) and the possibility of applying for the specialist pathway.

Within parts of the standard, the following statements indicate various time limitations:

- ...'short term' is usually considered up to 24 months.
- ... limited registration may be renewed up to three times. After this, you must make a new application for limited registration and meet any registration standards which are current at the time.
- ... practitioners in this pathway should not need to make more than one application for renewal of registration (as it is for up to 24 months), you should be aware that renewal of limited registration for postgraduate training or supervised practice is subject to meeting a number of requirements including providing evidence that you are satisfactorily progressing towards general or specialist registration.
- As training in this pathway is for a defined period, after which you have undertaken that you will no longer be seeking medical registration in Australia, practitioners in this pathway are not required to demonstrate satisfactory progress towards general or specialist registration...
- However, if circumstances arise that require you to apply for registration beyond 24 months...
- The Board will consider each application on a case by case basis.

Further, in section 4, point 5, the following application requirement appears:

- 'written confirmation from you that, at this time you have no intention of making further applications for registration at the end of the specified training period.'

The proposed pathway flowchart indicates that the applicant must apply initially for the position and then to the AMC (for primary source verification), the Medical Board of Australia and to the Specialist College; four applications in all. It is not clear to whom the applications for renewal should be addressed.

Questions for stakeholders on the draft guideline on short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration

Change of pathway name

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

It is suggested that the short form of the name not contain the word 'pathway' since this may lead to it being confused with the specialist pathway.

Eligibility for the short-term training in a medical specialty pathway

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

The 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?

This would possibly be best assessed on a case by case basis.

The role of the specialist colleges

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

No changes are proposed.

The process for approaching specialist colleges

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

As noted earlier, applicants have four application processes to complete. The process could change to allow for one application for the Board (registration) and the College (position approval) to be sent first to the College and once approval has been received, referred to the Board.

Information for the specialist colleges

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?

The information appears adequate however could also include: the arrangements for supervision (name of principal supervisor), a current certificate of good standing (dated less than six months ago), certificates of membership of appropriate medical bodies and a brief summary of why the applicant wishes to undertake the position. The CV should also be current.

Renewing registration beyond 24 months

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

RANZCOG considers that this approach is confusing, in that while the intention is that these positions are offered in the majority of cases for only up to 24 months, a clear pathway is shown for extending the time for much longer periods. Many applicants may seek to pursue this as a pathway to longer term practice in Australia. There should be a maximum time limit e.g. 4 years.

Specialist pathway – comparability assessment

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?

RANZCOG sees short term training and the assessment of overseas trained specialists in O&G for the specialist pathway (comparability) as two different processes. Trainees on short term training

positions would, however, be entitled to apply for the specialist pathway should they wish to do so, but would need to reapply to RANZCOG for initial assessment as per new applicants. There would be little advantage in them doing short term training initially as this could not count toward any period of training or oversight as a Partially or Substantially Comparable doctor - such training or oversight must be prospectively approved. There may be a small advantage however, in an applicant having completed a period of practice within the Australian context prior to applying for specialist assessment.

Change in circumstances

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; it is appropriate that the College have input when a trainee elects to change the training plan or the approved position or to extend the position. The College would be better placed to do so however, if progress reporting had been through the College. Normally if a specialist international medical specialist on the pathway to RANZCOG Fellowship elects to change their training position, a multi-source feedback assessment would be part of the process.

Definitions

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

The definitions appear appropriate.

Again, thank you for the opportunity to provide the College's perspective on the Review of Standards for Limited Registration.

Yours sincerely

Mr James McAdam

Chief Executive Officer