



## Submission to the Medical Board of Australia: July 2014

### REVIEW OF REGISTRATION STANDARDS

The Australasian College for Emergency Medicine (ACEM) welcomes the opportunity to provide feedback on the *Review of registration standards*, proposed by the Medical Board of Australia (MBA, the Board).

ACEM is a not-for-profit organisation responsible for the training and ongoing education of emergency physicians, and for the advancement of professional standards in emergency medicine, in Australia and New Zealand. ACEM, as the peak professional organisation for emergency medicine in Australasia, has a vital interest in ensuring the highest standards of emergency medical care are maintained for all patients across Australasia. ACEM supports the Board's review of the current medical registration standards relating to *Professional indemnity insurance, Continuing Professional Development (CPD) and Recency of practice*.

Following review of the draft revised standards, ACEM provides the following comments.

#### **Review of Professional Indemnity Insurance standard:**

ACEM considers the proposed changes to this standard to be appropriate.

#### **Review of Continuing Professional Development standard:**

The changes proposed for the CPD standard are also appropriate. ACEM also notes that the requirements of its recently revised CPD Program are aligned with those proposed in the new standard<sup>1</sup>.

With regards to the proposed record keeping requirement of the revised standard, ACEM suggests that the Board provide more comprehensive information to registrants regarding the types of suitable records that would provide sufficient evidence of CPD activity for audit purposes.

ACEM also recommends that the Board provide further clarification regarding its acceptance "*...that there may be CPD undertaken that fulfils the CPD requirements of more than one Specialist College or speciality*" (p.16, 'More Information' – point 3), and suggests the addition of the following wording to this item:

*"...and that a specialist college may choose to accept fulfilment of another college's CPD requirements as meeting their own requirements".*

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<sup>1</sup> ACEM CPD Program 2015. <https://www.acem.org.au/Continuing-Professional-Development/CPD-Program-2015.aspx>

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With regards to medical practitioners with limited registration; ACEM currently requires Overseas Trained Specialists/Specialist International Medical Graduates, with limited registration and working towards specialist recognition, to complete CPD as per either (i) ACEM's CPD program or (ii) another ACEM approved program. ACEM suggests that the Board consider including this option in the section 'What must I do? / Point 5'.

**Review of Recency of Practice standard:**

ACEM supports the Board's desire to '*strike a better balance between protecting the public and impact on registrants...*', whilst also ensuring there is sufficient flexibility for practitioners. While there is broad support for the introduction of this requirement, members have also expressed concern at whether four weeks of practice per year is sufficient, and whether a longer time period could be more appropriate. ACEM acknowledges that there is currently limited literature available in relation to the amount of practice that a medical practitioner must undertake to demonstrate recency of practice. ACEM therefore suggests, that pending implementation of this new requirement, the Board collect appropriate data to better inform future iterations of this standard, and ensure stakeholders remain updated, as to the implementation of this new requirement.

ACEM also recognises however, that there may be situations where Fellows may, due to extenuating circumstances, be unable to practice for significant periods of time. This includes situations such as parental leave or prolonged illness, and is reflected in the College's annual CPD requirements, where in such circumstances, ACEM Fellows are able to apply for an exemption of up to 12 months<sup>2</sup>, such that they do not need to do any CPD activities for that period. ACEM recommends that the Board consider incorporating such exemptions into the revised 'Recency of Practice' standard. This will minimise the potentially significant impact for medical practitioners who face similar extenuating circumstances.

As per ACEM's feedback for the revised CPD registration standard, ACEM suggests that the Board also consider the types of records which will sufficiently demonstrate a 'minimum number of weeks worked', whilst also considering the impact on registrants. In the case of hospital employees, ACEM suggests that a suitable record to demonstrate this would be a statement from the relevant departmental director or a letter or certificate from the employer's Human Resources department.

Thank you for the opportunity to provide feedback to Board in its public consultation on the *Review of registration standards*. If you require any clarification or further information, please do not hesitate to contact the ACEM Director of Policy and Research, Dr Andrew Gosbell (03) 9320 0444 or [andrew.gosbell@acem.org.au](mailto:andrew.gosbell@acem.org.au).

Yours sincerely,



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PRESIDENT

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<sup>2</sup> ACEM CPD Forms and Policies. <https://acem.org.au/Continuing-Professional-Development/CPD-Forms.aspx>