



30 January 2015

Medical Board of Australia  
GPO Box 9958  
Melbourne Vic 3001

**Public consultation on the draft revised 'Guidelines – Supervised practice for international medical graduates'.**

Email: [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

The Australian College of Rural and Remote Medicine (ACRRM) thanks the Medical Board of Australia (MBA) for the opportunity to provide further comment on the draft revised *Guidelines - Supervised practice for international medical graduates* in this the public consultation phase.

ACRRM was pleased to note that a number of the issues raised by the College in the preliminary consultation phase have been considered in this revised document. But the College is disappointed that some key issues raised by ACRRM have not been addressed in the revised draft guidelines.

ACRRM provides the following comment for your consideration.

*Requirement for positions in general practice – Practice must be accredited to RACGP Standards for General Practice (4<sup>th</sup> edition)*

ACRRM wishes to reiterate its concern that mandatory accreditation only based on the RACGP practice standards may eliminate some rural and remote practices from employing IMGs. This could impact significantly on the rural and remote workforce and ACRRM would encourage the MBA to further consider this matter.

*Supervision to IMG ratio*

While ACRRM acknowledges the amendment to draft guidelines to more clearly articulate the number of IMG's that can be supervised at any one time, the College is disappointed that the concern expressed by ACRRM in regard to supervision guidelines including level 1 supervised IMG's in general practice has not been re-considered. ACRRM believes strongly that level 1 supervision is NOT appropriate in the general practice setting particularly in the rural and remote environment in which many IMG's are working.

ACRRM refers the Board to our previous correspondence on this matter and request this issue be reconsidered by the Board.

*Changing supervision levels*

The process proposed for consideration of a request to change supervision levels has not been significantly revised since the preliminary consultation phase. The process still relies solely on the Board review of 'the work performance report prepared by the supervisor' as the major source of information on which decisions will be made. This remains a concern for ACRRM. As previously raised, this process is open to 'conflict of interest' as there is no independent advice in the decision making process as a matter of course. ACRRM would strongly recommend the Board consider introducing a process which includes independent advice.

Overall ACRRM is supportive of the majority of the changes to the guidelines as the College is committed to ensuring a quality improvement process is in place that contributes to the quality and level of supervision being provided to IMG's in general practice and in particular to those working in rural and remote communities where they represent 40% of the workforce.

Should you wish to discuss or require further information please do not hesitate to contact Di Wyatt, Manager IMG Programs [d.wyatt@acrmm.org.au](mailto:d.wyatt@acrmm.org.au) or phone 07 31058200.

Yours sincerely



Marita Cowie  
**Chief Executive Officer**