Dear AHPRA,

Please find below my comments relevant to the consultation.

I am involved in the supervision of IMGs in the specialty of Orthopaedic Surgery and was supervised as an IMG myself in previous years. I find the duplication of documentation both at the start of practice of a supervised practitioner and ongoing to be frustrating. The reports which I have to provide for AHPRA are very similar to the ones which I have to provide to the Australian Orthopaedic Association who administer the supervision process for RACS. Previously, under the State Medical Board of South Australia, this was not required. I would suggest that satisfactory progress with the specialist college's process should be all that is required rather than a separate report for AHPRA as the college's processes are extremely robust and that the training and supervision plan which is prepared for the specialist college be regarded as adequate for AHPRA.

With regard to CPD requirements, these appear reasonable, especially as RACS criteria for both specialists and IMGs exceed these hours. Previous correspondence has indicated a desire by the Board to remove the category of registration "in the public interest". I would ask the board to keep in mind a mechanism to allow those who did not have time to do so when they were working full time to be able to perform pro bono work and/or work in areas of need on a more part time basis after retirement from their full time job.

Sincerely,

