

## Your details

Name: [REDACTED]

Organisation (if applicable):

Are you making a submission as?

- An organisation
- An individual medical practitioner
- Other registered health practitioner, please specify:
- Consumer/patient
- Other, please specify:
- Prefer not to say

Do you give permission to publish your submission?

- Yes, with my name
- Yes, without my name
- No, do not publish my submission

# Feedback on the Consultation regulation impact statement

The Medical Board of Australia is consulting on three options to ensure late career doctors are able to keep providing safe care to their patients.

The details of the options for consideration are contained in the [consultation regulation impact statement](#).

1. Should all registered late career doctors (except those with non-practising registration) be required to have either a health check or fitness to practice assessment?

If not, on what evidence do you base your views?

Yes, as the paper notes, late career doctors are more likely to have notifications made against them. It is also advisable for both doctors and the general population to have regular health checks, particularly with advancing age.

2. If a health check or fitness to practise assessment is introduced for late career doctors, should the check commence at 70 years of age or another age?

This should ideally be based on the data, but I would support either 70 or 75 years of age.

3. Which of the following options do you agree will provide the best model? Which part of each model do you agree/not agree with and on what evidence do you base your views?

**Option 1** Rely on existing guidance, including Good medical practice: a code of conduct for doctors in Australia (Status quo).

**Option 2** Require a detailed health assessment of the 'fitness to practise' of doctors aged 70 years and older every three years for doctors from the age of 70 and annually for doctors from the age of 80.

These health assessments are undertaken by a specialist occupational and environmental physician and include an independent clinical assessment of the current and future capacity of the doctor to practise in their particular area of medicine.

**Option 3** Require general health checks for late career doctors aged 70 years and older every three years for doctors from the age of 70 and annually for doctors from the age of 80.

The health check would be conducted by the late career doctor's regular GP, or other registered doctor when this is more appropriate, with some elements of the check able to be conducted by other health practitioners with relevant skills, e.g., hearing, vision, height, weight, blood pressure, etc.

Option 3.

I agree with all parts of Option 3 on the basis that this is good medicine and does not overburden either the doctor or the medical workforce.

Confidential collection of data could be used to inform future policy.

4. Should all registered late career doctors (except those with non-practising registration) have a cognitive function screening that establishes a baseline for ongoing cognitive assessment?

If not, why not? On what evidence do you base your views?

I believe this should be left in the hands of the doctor's GP as currently occurs for the general population.

However, given the incidence of cognitive impairment in the general population beyond 80 years, that age could be used for more formal assessment.

5. Should health checks/fitness to practice assessments be confidential between the late career doctor and their assessing/treating doctor/s and not shared with the Board?

Note: A late career doctor would need to declare in their annual registration renewal that they have completed the appropriate health check/fitness to practice assessment and, as they do now, declare whether they have an impairment that may detrimentally affect their ability to practise medicine safely.

It would be unfortunate if non-identified data was not collected and made available to the Board to measure whether this initiative is necessary and effective.

6. Do you think the Board should have a more active role in the health checks/fitness to practice assessments?

If yes, what should that role be?

No.  
The program as detailed is very comprehensive.

# Feedback on draft Registration standard: Health checks for late career doctors

This section asks for feedback on the Board's proposed registration standard: Health checks for late career doctors.

The Board has developed a draft Registration standard: health checks for late career doctors that would support option three. The draft registration standard is on page 68 of the CRIS.

**7.1. Is the content and structure of the draft Registration standard: health checks for late career doctors helpful, clear, relevant, and workable?**

Yes

**7.2. Is there anything missing that needs to be added to the draft registration standard?**

Not that I can see.

**7.3. Do you have any other comments on the draft registration standard?**

No

# Draft supporting documents and resources

This section asks for feedback on the draft documents and resources developed to support Option three - the health check model.

8. The Board has developed draft supporting documents and resources (page 72 of the CRIS). The materials are:

- C-1 Pre-consultation questionnaire that late career doctors would complete before their health check
- C-2 Health check examination guide – to be used by the examining/assessing/treating doctors during the health check
- C-3 Guidance for screening of cognitive function in late career doctors
- C-4 Health check confirmation certificate
- C-5 Flowchart identifying the stages of the health check.

The materials are on page 72 of the CRIS.

**8.1. Are the proposed supporting documents and resources (Appendix C-1 to C-5) clear and relevant?**

Yes

**8.2. What changes would improve them?**

None at this stage.  
The program requires feedback and evaluation to ensure that it is fit for purpose and not overly burdensome.

**8.3. Is the information required in the medical history (C-1) appropriate?**

Yes. Incredibly detailed and likely beyond the health checks that most currently undergo.

**8.4. Are the proposed examinations and tools listed in the examination guide (C-2) appropriate?**

Yes. Incredibly detailed and likely beyond the health checks that most currently undergo

**8.5. Are there other resources needed to support the health checks?**

Not that I can determine at this stage.