



australian diagnostic imaging association

ADIA SUBMISSION ON THE MBA DRAFT REVISED REGISTRATION STANDARD: CONTINUING PROFESSIONAL DEVELOPMENT

February 2020

The Australian Diagnostic Imaging Association (ADIA) is appreciative of the opportunity to provide comment on the Medical Board of Australia's (MBA) *Draft revised Registration standard: Continuing professional development*.

ADIA represents radiology practices throughout Australia, both in the community and in hospitals. It promotes the ongoing development of policy, standards and appropriate funding to ensure that all Australians have affordable access to quality radiology services. This supports radiology's central role in the diagnosis, treatment and management of a broad range of conditions in every branch of medicine. Over 1200 radiologists and nuclear medicine specialists practice with ADIA member clinics.

ADIA considers the draft revisions to be an improvement on the current registration standards for continuing professional development. The introduction of CPD homes, and the inclusion of high-level requirements for CPD programs will enable specialists to select the program best suited to their circumstances while ensuring a consistent standard across the specialisation.

If you have any questions relating to this submission, please contact Chris Kane on 03 9026 1518.

In this submission, ADIA has responded to each of the relevant 'Questions for Consideration' featured in the MBA's consultation paper.

Do you have any other comments on the draft revised CPD registration standard?

Professional Development Plans

While ADIA supports the concept of introducing professional development plans into the registration standards, the implementation of the proposal should be carefully considered.

It is reasonable to require specialist practitioners to proactively set their own professional development goals each year and determine an appropriate pathway to achieve these goals. However, as with any professional development plan, there will be situations where unforeseen circumstances may lead the specialist to deviate from the plan throughout the course of the year. There may be various reasons for this, from competing priorities or changes in the specialist's professional development goals, to personal circumstances.

For this reason, a professional development plan should be considered as a 'guidance tool' for the specialist's professional development and whether the specialist meets the self-determined development goals should not be assessed by the CPD Home.

Should the MBA wish to include a professional development plan into the CPD registration standards, ADIA recommends the MBA provide both specialists and CPD Homes with a sample template for the written plan. This would provide the basis for a consistent standard across all specialisations, while offering specialists conceptual guidance on how to meet the standard.

Who does the proposed registration standard apply to?

ADIA agrees with the MBA's list of practitioners to whom the proposed registration standard should apply. ADIA did not identify any other groups that should be exempt from these registration standards.

International medical graduates

ADIA considers that international medical graduates (IMGs) should be required to complete CPD in line with Australian medical graduates. However, the additional training and/or assessments required by those IMGs who have been assessed as partially or substantially comparable should count toward the requirements of their CPD program.

Those IMGs who are assessed as either substantially or partially comparable, are typically required to complete a certain amount of upskilling or supervised practice to meet the college's standard for recognition as a specialist. This will typically be the professional development priority for IMGs following their interim assessment of comparability.

Requiring these specialists to meet *additional* CPD requirements will further burden the IMG, leading them to focus on alternative professional development opportunities and detracting from the time spent meeting the standard of an Australian-trained specialist.

Exemptions

ADIA considers the exemptions listed in the draft registration standards to be appropriate, provided the circumstances of each specialist applying for an exemption is assessed on a case-by-case basis. The 12-month threshold is suitable for this purpose.

Applications for individual exemption should be assessed by the MBA.

Practitioners with more than one scope of practice or more than one specialty

The draft standards are an improvement on the current registration standards for those specialists with a broad scope of practice or more than one specialty.

Under the revised standards, CPD homes will have the capacity to provide CPD programs that are compatible with multiple specialties. In conjunction with the high-level standards set by the colleges, these programs will enable specialists to partake in quality CPD programs that cover more than one specialty.

CPD required

The types and amounts of CPD requirements are both clear and relevant.

Specialist radiologists should be required to undertake activities focussed on measuring outcomes as well as activities focussed on reviewing performance and educational activities in line with other specialists.

CPD homes

ADIA considers the requirement for specialist practitioners to participate in the CPD program of an accredited CPD home to be an improvement on the current requirement. By broadening the eligibility of those institutions who offer CPD programs, the MBA will encourage innovation in CPD programs.

ADIA considers that CPD homes should have general oversight of specialists under their CPD program, and should provide assistance to those specialists who are at risk of failing to meet their CPD requirements. However, it should not be the responsibility of the CPD homes to take action against those specialists who have failed to meet the CPD requirements of the MBA's registration standards.

As the MBA is the authority responsible for the regulation of registered medical professionals, it would be appropriate for the CPD home to refer practitioners who have failed to meet the CPD program requirements to the MBA for action.

High level requirements for CPD programs

With the inclusion of CPD homes in the registration standards, the addition of high-level requirements will maintain a consistent standard between programs for each specialty.

ADIA agrees with the MBA that specialist colleges will be best placed to set these high-level requirements.

Transition arrangements

ADIA suggests a transition period of 12-18 months prior to the full implementation of the new arrangements. This would ensure prospective CPD Homes have enough time to develop their CPD programs, and communicate the requirements of the new programs to the respective specialists.