



## COLLEGE SUBMISSION

Response to MBA Public Consultation:  
Draft revised *Good Practice Guidelines for the specialist  
international medical graduate assessment process*

February 2020

### **About the Australian College of Rural and Remote Medicine (ACRRM)**

ACRRM's vision is *the right doctors, in the right places, with the right skills, providing rural and remote people with excellent health care*. It progresses this through delivering quality vocational training and professional development education programs; setting and upholding practice standards; and providing support and advocacy services for rural doctors and the communities they serve.

ACRRM is accredited by the Australian Medical Council to set standards for the specialty of general practice. The College's programs are specifically designed to provide Fellows with the extended skills required to deliver the highest quality Rural Generalist model of care in rural and remote communities, which often experience a shortage of face-to-face specialist and allied health services.

### **Key Proposed Changes**

The College notes that the proposed Guidelines are not intended to significantly change the existing assessment processes for Specialist International Medical Graduates (SIMGs), but rather to give clarity to existing processes and improve transparency and procedural fairness.

ACRRM is generally supportive of the proposals to:

- Reframe the Guidelines as Standards, noting that the term *Standards* in this context refers to the common definition rather than mandatory registration standards in the National Law (Proposal 1)
- Reword and restructure comparability definitions with the intention of making them clearer and easier to read. (Proposal 2)
- Introduce a minimum period of supervised practice for SIMGs who are assessed as substantially comparable or partially comparable, and its stated aims. (Proposal 3)
- Clarify the purpose of the area of need assessment and when it might be appropriate for a college to conduct an area of need assessment only. (Proposal 5)
- Clarify the appropriateness of requirements for specific overseas specialist registration. (Proposal 6)



However, the College does not support the proposal for the provision of a *Summary of preliminary findings* of the paper-based assessment and interview (if conducted) to SIMGs who are assessed for comparability, before an interim assessment decision is made. (Proposal 4).

Implementing this proposal would add additional steps to ACRRM's existing assessment process as it would duplicate the steps documented in the College's *Reconsideration, Review and Appeals Policy (RRA)*. The RRA policy provides a mechanism for an SIMG to *provide clarification or submit further evidence* following a decision, without the need to lodge a formal appeal. This policy applies to the decisions of the assessment panel following both the paper-based assessment and interview. The College's application process also already allows for the prompt amendment of a final outcome report where minor inaccuracies or clarifications are identified and addressed.

ACRRM therefore considers that the proposed new protocol would unnecessarily extend the timeframe of the comparability assessment process without providing any significant benefit to the SIMG. This would be onerous and frustrating for all parties concerned) and would also increase the administrative impost on the College.

## Response to Consultation Questions

- 1. Are the proposed Standards clearer and easier to read?** The College believes that the proposed Standards are clearer and that no further clarification is required with respect to the nature of the assessment process.
- 2. Comparability Definitions:** The rewording and restructuring of the comparability definitions makes the terms clear and reduces the likelihood of misinterpretation. No further rewording or explanation is required.
- 3. Substantially Comparable:** The replacement of the term *peer review* with *supervised practice* reflects terminology which is more widely used and understood.
- 4. Mandatory minimum of supervised practice:** The College supports a mandatory minimum of supervised practice and believes that the specified minimum periods are appropriate.
- 5-7. Proposed Summary of Preliminary Findings; timeframes for provision; and level of information required:** ACRRM does not support this proposal for the reasons outlined in the previous section. Given that the College does not support the proposal, no further comment will be provided.
- 8. Proposal for conducting an area of need assessment only:** The proposal for when it is appropriate to conduct an area of need assessment is helpful and appropriate.
- 9. Proposal for colleges to publish a minimum list of requirements for eligibility for application:** The College believes that this proposal is appropriate and that the minimum requirements as stated are appropriate.



**10. Revised guidance on assessing SIMGs for limited scope of practice:** While it is unlikely that this guideline will be relevant to ACRRM as a general practice college, ACRRM believes that the revised guidance is clear.

**11-12. Omissions and other comments:** ACRRM thanks the Medical Board of Australia for the opportunity to provide comments on the draft revised Guidelines. The College has no other feedback but is happy to provide more information or clarification if required.

## College Details

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*ACRRM acknowledges Australian Aboriginal People and Torres Strait Islander People as the first inhabitants of the nation. We respect the traditional owners of lands across Australia in which our members and staff work and live and pay respect to their elders past present and future.*