



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Response template: Public consultation - proposed *Supervised practice framework* and supporting documents

The National Boards (excluding Pharmacy and Psychology) and Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the proposed *Supervised practice framework* (framework) and supporting documents.

This response template is an alternative to providing your response via the online survey available on [our website](#).

IMPORTANT INFORMATION

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the proposed framework and supporting documents. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

Publication of responses

Published responses will include the name of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.



Submitting your response

Please send your response to: ahpra.consultation@ahpra.gov.au

Please use the subject line: Feedback on Supervised practice framework

Responses are due by: **17 December 2019**

General information about your response

Are you responding on behalf of an organisation? Yes	
	Are you a registered health practitioner? No If yes, which profession(s)? Medical Specialist College
Name (optional)	The Royal Australasian College of Medical Administrators (RACMA) 
Contact phone number (optional)	

Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the proposed framework and supporting documents.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

<p>National Boards and AHPRA have developed the <i>Supervised practice framework</i> (the framework) and supporting documents to enable a responsive and risk-based approach to supervised practice across the National Registration and Accreditation Scheme (the National Scheme).</p> <p>The National Boards' preferred option is to adopt the proposed framework and supporting documents.</p> <p>1. How helpful and clear is the content and structure of the proposed framework? Please explain your answer.</p>
<p>The proposed Framework is clearer, and the content and structure is more comprehensive. We are largely supportive of the proposed framework and its aims to simplify procedures and information relating to supervised practice.</p>
<p>The word 'consult' is used to describe the interaction between a supervisee and supervisor in the levels of supervised practice (see Section 5 Levels in the framework and the <i>Fact sheet: Supervised practice levels</i>). The word 'consultation' is often used to describe the interaction between a patient/client and a health practitioner.</p> <p>2. Is the meaning of 'consult' clear for the purposes of the supervised practice levels? Why or why not?</p>
<p>RACMA suggest in avoiding confusion and ambiguity by having a glossary to provide clarity.</p>
<p>3. Is there any content that needs to be changed, added or removed in the proposed framework and/or supporting documents? If so, please provide details.</p>
<p>Further clarity and consideration in the proposed framework is required to address the differing needs and special circumstances of supervisors and supervisees. These include personal leave issues and requirements, personal health requirements, disability needs and extenuating personal circumstances.</p>
<p>4. Are there any other ways that the Board can support supervisees, supervisors and employers involved in the supervised practice arrangement?</p>
<p>No comment</p>
<p>5. Is there anything else the Board should consider in its proposal to adopt the framework and supporting documents, such as impacts on workforce or access to health services?</p>
<ol style="list-style-type: none">1. Impacts on the medical workforce are very different for rural and remote areas as compared with cities. Issues of resources and access to specialists, supervisors and supervisees must be given further clarity in rural settings. Greater support is needed.2. Digital health and technologies needs further consideration as the impact to the profession continues to change medical workforce needs and requirements.3. Indigenous trainees require further focus as this cohort are subjected to differing requirements and needs.

6. Do you have any other comments on the proposed framework and/or supporting documents?

No comment.

Thanks!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the proposed framework and supporting documents.