

3 July 2024

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AHPRA/Medical Board
Via: SIMGPathwaysReview@ahpra.gov.au

Public consultation on the revised Registration standard: specialist registration

Dear AHPRA/Medical Board

Thank you for the opportunity to provide feedback on the draft revised *Registration standard: specialist registration*.

I write from the perspective of Medical Director within a public sector Mental Health Service. In this role, I have been involved in the process of recruiting overseas consultant psychiatrists and supporting them in meeting requirements for Fellowship.

In response to questions for consideration:

Is the content and structure of the draft revised specialist registration standard helpful, clear, relevant and workable?

Yes. The document outlines issues and suggested alternatives as well as reasons for suggesting changes. Whether or not there is a connection with entering a college Substantial Comparability Pathway once the expedited specialist pathway is successfully completed remains unclear.

Is there any content that needs to be changed, added or deleted in the draft revised specialist registration standard?

See below. Key points include:

- Supervision of college trainees.
- Clear processes for seeking fellowship.
- Clarification of whether supervised practice is overseen by the relevant college.
- Acknowledgement of additional challenges associated with migration.

Are there any impacts for patients and consumers, particularly vulnerable members of the community, that have not been considered in the draft revised specialist registration standard?

From a public sector perspective, there is a risk of annual or second yearly turnover of SIMGs who enter private practice once registration requirements are completed. This can also have a detrimental effect on communities who receive service from SIMGs naïve to local systems. Options for improving longer term retention should be considered.

Are there any impacts for Aboriginal and Torres Strait Islander Peoples that have not been considered in the draft revised specialist registration standard?

From a public sector perspective, there is a risk of annual or second yearly turnover of SIMGs who enter private practice once registration requirements are completed. This can also have a detrimental effect on communities who receive service from SIMGs naïve to local systems. Options for improving longer term retention should be considered.

Are there any other regulatory impacts or costs that have not been identified that the Board needs to consider?

- Supervision requirements of trainees.
- Capacity for billing when the SIMG is not issued with a Provider Number.
- Acknowledgement of personal costs associated with seeking employment and migration, especially for older SIMGs or SIMGs with families. Processes that improve predictability and transparency should assist in supporting Applicants and Employers in navigating the process.

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

Expedited Pathway

The Expedited Pathway is worth pursuing.

The following may need to be taken into consideration:

- Evidence of careful scrutiny of how substantial equivalence is determined.
- Clarification about whether the removal of a required college assessment relates to entry into Australia or to continuing accreditation or both.
- Clarification about whether the period of supervised practice is overseen by the relevant college. For example, would Expedited Pathway candidates be automatically eligible for the Substantial Comparability pathway?
- At least from a public sector point of view, acknowledgement that appointment is already based on an accepted process for appointment (ads, review of application, interviews, references, etc.). These existing steps could be identified and reviewed as additional steps for ensuring quality. Given specialists involved in the appointments process are generally also college Fellows there may be a way of embedding college requirements into appointment processes.
- Steps to ensure that Expedited Pathway candidates will be able to supervise trainees within a college training program. From a public sector point of view, inability to supervise trainees will have repercussions on junior workforce recruitment and may be a reason not to recruit an otherwise suitable applicant.

Option two – revise the existing standard

I would prefer this option.

In relation to estimated impacts:

- Specialist medical colleges. “Individual applicants will be free to seek college fellowship once they have been granted specialist registration.” The steps required for applicants to seek fellowship would be important to make clear to limit the situations where a specialist is left in limbo. Further to this, clarification of how the specialist will be able to be acknowledged as a supervisor of trainees will be important. Accreditation as College supervisors should be part of the onboarding process and may involve a tailored orientation to the expectations of supervisors. Ideally, it would be good for the successful expedited pathway applicant to be immediately eligible for the relevant college Substantial Comparability Pathway.
- Employers. One challenge with filling vacancies is to ensure that the SIMG can fill all aspects of the role including supervision.

A current challenge relates to the significant time lag between the interview process and the eligibility for SCP process. With various predictable delays, it can take a year or more before the successful applicant is advised of their suitability for SCP by the relevant college. When this fails, there are major ramifications for the applicant as well as the employer in terms of wasted effort, premium labour costs to fill gaps and service provision. One option to consider is embedding SCP eligibility into the appointments process so that both can occur simultaneously. This would require some entrustment of process to the employer but acknowledges that the employer in most instances will include fellows of the relevant College (whose assessments are already relied on by the College to successfully complete the SCP). There may be modification required to the appointments process to ensure SCP eligibility needs are met. A pathway could look something like:

- Meets Expedited Pathway requirements.
- Is deemed appointable + SCP pathway requirements are met.
- Enters SCP.

I hope these reflections and comments are of assistance.

Thank you,



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