

## ASSESSING INTERNATIONAL MEDICAL GRADUATES (IMGS) SEEKING SPECIALIST RECOGNITION AND RACMA FELLOWSHIP POLICY

## 1. BACKGROUND

International Medical Graduates (IMG) or specialists who wish to practice in the specialty of Medical Administration in Australia must apply directly to the Royal Australasian College of Medical Administrators (RACMA) for an assessment of their comparability to an Australian trained and qualified medical administrator. RACMA's IMG assessment process evaluates the training, qualifications and experience of the IMG for comparability with an Australian trained Medical Administrator.

The Australian Medical Council (AMC) specialist pathway for Medical Administration allows for an assessment of specialist recognition which in turn will enable applicants to register and practice as specialist medical administrators.

Before an IMG can apply for assessment by the Royal Australasian College of Medical Administrators, an application must be submitted to the Australian Medical Council (AMC) for verification of their medical qualifications *(EPIC)*.

*EPIC* is an Electronic Portfolio of International Credentials service used by Australian Medical Council to verify medical credentials for registration purposes with the Medical Board of Australia and for specialist assessment by an Australian Medical Specialty College.

For information on *EPIC* and primary source verification applicants should refer to the AMC website at <u>www.amc.org.au/assessment</u> and seek information regarding the registration pathways and assessment requirements with AHPRA: www.medicalboard.gov.au/Registration/International-Medical-Graduates/Specialist-Pathway.

All assessment pathways have the following common requirements:

- English language proficiency;
- EPIC verification of qualifications;
- Assessment against a position description (if applying for a specific position);
- A period of supervised practice (unless otherwise determined by the relevant medical college);
- Orientation relevant to qualifications and the position held; and
- Access to continuing professional development.

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## 2. PURPOSE

This policy sets out the process and governance for assessing IMGs seeking to register in Australia as specialist medical administrators and establishes governance and guidelines for the RACMA Interview Panels that assess comparability of IMG seeking to be qualified to practice in medical administration in Australasia and seeking membership with the College undertaking training towards RACMA Fellowship.

#### 3. GUIDING PRINCIPLES

In undertaking the assessment of IMGs, RACMA has an obligation to the public to allow an applicant a fair opportunity to demonstrate their competency in accordance with the principles of natural justice. Each application will be assessed on its own merits.

Assessment will be based on the following standards:

- AHPRA's definition for the comparability of the International Medical Graduate (see below):
  - an applicant has undertaken formal and/or specialty training in medical administration in their country of origin which is deemed comparable or partially comparable to that which an Australian medical practitioner has undertaken and had recognised by the RACMA as equivalent and meeting eligibility to apply to be a Fellow of RACMA and
  - an applicant has significant health service management experience that contributes to comparability to a recent Fellow of RACMA

The RACMA IMG Assessment Panel will determine the comparability of the applicant based on the application, accompanying papers and referee reports, performance and response to the questions by the Panel. The Panel's recommendation(s) will be made to the RACMA Education and Training Committee (ETC) for endorsement and then submitted to the RACMA Board for approval. The Panel may make recommendations for a modified training and assessment program that will allow the IMG to demonstrate (full) comparability.

Where an IMG is not considered by the RACMA IMG Assessment Panel to have the training, experience, qualifications and practice similar to the Australian training specialist the applicant will be required to undertake training, academic and assessment requirements. This training and assessment can be obtained by the IMG through the RACMA Fellowship Training Program (FTP). The applicant will need to meet the entry requirements to RACMA Fellowship Training Program by first attaining interim general / specialist registration with the Australian Health Practitioner Regulation Agency (AHPRA).

Once the Board approves, the RACMA informs:

- the applicant of the assessment outcome and recommendations, and any requirements for entry to the RACMA Fellowship Training Program.
- The Australian Medical Council (AMC) via uploading the relevant forms to the AHPRA Portal (Reports 1 and 2 if applicable at the time).

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## 4. SCOPE

RACMA recognizes its obligation to assist the AMC and registration authorities in the assessment of the credentials and comparability of overseas trained graduates/specialists seeking specialist recognition in Australia.

This Regulation applies to international medical graduates with previous experience and qualifications in medical management seeking registration in the specialty of medical administration and entry to the RACMA Fellowship Training Program to gain comparable medical administration specialist qualifications.

#### 5. ELIGIBILITY TO APPLY FOR ASSESSMENT BY THE RACMA (SPECIALTY COLLEGE)

To be eligible to apply to the RACMA for specialist assessment, the applicant must have the following:

- a primary medical degree (MBBS) issued by a medical school approved by the Australian Medical Council (AMC) verified through EPIC;
- completed formal postgraduate training in a field of specialist medical practice recognised in Australia;
- the AMC verification of their existing overseas training and qualifications through the ECFMG International Credential Services and EPIC (refer to the AMC website for information); and
- completed the RACMA specific application form, accompanied by the relevant application and assessment Fees, and submit to the RACMA with documented evidence of their qualifications, training and experience together with the referee reports.

#### 6. RACMA PROCESS AND PROCEDURE

RACMA follows its own internal process for comparability assessment to determine the extent to which the applicant is comparable to the standard of a specialist trained in that speciality in Australia (specialist recognition), in accordance with the National Registration and Accreditation Scheme (NRAS) established 1 July 2010. RACMA will apply the following NRAS Comparability Definitions – revised July 2014 (see Attachment 1).

RACMA will, in line with AHPRA requirements, assess the IMGs applying to the College as per following:

- Constitute a standing panel for assessment of IMGs consisting of the following:
  - Three senior Fellows (at least two of whom are Censors) who will make assessments as required.
- The Panel may seek advice from additional Fellow members as expert advisors such as the Dean of Education or the Censor in Chief. These Fellows may not be given the voting/decision making rights but will act in an advisory role to the Panel only.

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- Upon a review of the application by an IMG for comparability assessment, the College will:
  - Acknowledge the receipt of the application
  - Refer the application to the standing IMG assessment Panel (where any member of the standing panel is unavailable, a senior Fellow may be nominated by the Chair of the Education and Training Committee).
  - Complete a paper based evaluation of the IMG's experience and skills. In some cases
    where the experience of the applicant in medical administration is not sufficient, the IMG
    Assessment Panel will initially review the application via circulation and advise, on the
    merit of the application, whether it warrants granting an assessment interview for the
    applicant.
  - If the interview is granted, the RACMA will advise to the applicant the date for the interview, any additional documentation required (if applicable) and provide information on the applicable fees to be paid to the RACMA prior to the commencement of the process.
  - An applicant and the IMG Assessment Panel are informed of the date and the procedure for the interview.
  - The IMG Assessment Panel will be provided with a package of application papers and relevant documents and referee reports for the Panel and the assessment documents to be completed during the interview
  - Criteria for the selection of the IMG Assessment Panel includes the following considerations:
    - experience in the assessment of the recognition of prior learning in RACMA
    - knowledge of the Australian Medical Council (AMC) policies and requirements in relation to the assessment of International Medical Graduates
    - knowledge of the RACMA Curriculum and the Fellowship Training Program, and its entry requirements
    - understanding of international programs for medical administration
    - understanding of the RACMA Constitution and regulations in relation to IMG assessment, modified programs and College membership compliance

#### 7. CONSTITUTIONAL PROVISIONS AND GOVERNANCE

#### 7.1 Comparability Outcomes

There are 3 categories of comparability outcomes for International Medical Graduates: (1) **Substantially, (2) Partially, or (3) not-comparable** to Australasian Fellows in Medical Administration (see Attachment 1).

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#### 7.2 Board Approval Rewrite to meet changed process

According to the RACMA Constitution the Board must satisfy itself that an applicant meets all the criteria for Fellowship of the College and will approve all Membership.

The usual practice requires applicants for Fellowship to undertake the RACMA Examination.

In those situations where the IMG is deemed to be substantially comparable, the RACMA Board will admit an IMG applicant to Fellowship without the exit examination. The examination as mentioned in the constitution will be the IMG assessment process which has been strengthened with the inclusion of the Chair of the Board of Censors, and exploring all competencies required to meet Fellowship.

Fellowship will only be granted once the Board is satisfied that the recommendations that have been made by the IMG Assessment Panel have been met by the applicant, in particular those relating to undertaking supervised practice in medical management.

#### 7.3 Medical Board of Australia benchmarking

RACMA will be required to report on the assessment and timeframes of IMG applications to the Medical Board of Australia (MBA). The College will also report against a number of proposed measures to enable the MBA to monitor compliance with the Good Practice Guidelines for specialist IMG assessment process and provide an explanation in the report for every IMG assessment that does not meet the benchmark or compliance measures.

#### 8. ASSESSMENT

#### 8.1 Review of the Application

In assessing international medical graduates with postgraduate management qualifications, training and experience, the College must apply the standards required for admission to the Fellowship Training Program and successful completion of the theoretical and practical components of the syllabus.

International medical graduates seeking recognition as specialist medical administrators (and membership as a Fellow of RACMA) without postgraduate management qualifications, training and experience are not eligible for specialist pathway assessment and must proceed with either Standard Pathway or the Competent Authority Pathway assessment via the AMC procedures.

Alternatively, after meeting medical registration requirements in Australia applicants without postgraduate management qualifications, training and experience can proceed with an application for RACMA candidacy without recognition of prior learning.

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## 8.2 Key Assessment Tools

The Panel's review and subsequent approval of the outcome by the RACMA Board will be based on the following documents provided to the College with the Application form:

- Applicant's CV
- Applicant's verification of their qualifications/credentials
- Referee reports
- Applicants response and performance to the structured interview
- Comparability definitions and guidelines by the Regulatory Authority for the assessment of the IMGs and OTS (overseas trained specialists)
- RACMA Medical Leadership and Management Curriculum

#### 8.3 The Assessment Process

The assessment of comparability is conducted by the College IMG Assessment Panel, appointed to review the applicant's training and experience, and determine the applicant's comparability as per the definitions set by the Regulatory Authority and the College standards of practice. The IMG Assessment Panel will discuss and explore with the applicant the level of experience and scope in medical management, identify areas of concern and seek further clarification to determine the level of comparability based on the evidence presented and performance of the applicant at the interview. The Applicant may be asked for or the Panel may request to seek additional evidence to substantiate key claims. The IMG Assessment Panel will identify any deficiencies/gaps in the interview discussion and will reflect/report these in the assessment papers so as to make recommendations for any additional training and knowledge development.

The Interview should address the following:

- How closely the qualification, knowledge and experience of the IMG Applicant is comparable to those of an Australian trained specialist
- How closely has the applicant demonstrated any evidence of his/her skills, abilities, knowledge, attitude, qualification and depth of experience as a medical administrator to the role competencies outlined in the RACMA Medical Leadership and Management Curriculum, and most, if not all, of the following areas that are examined and assessed by Censors for the Pre-Fellowship Oral Examination.
  - current health policy initiatives;
  - clinical governance
  - medico-legal issues in health services management;
  - financial management of health services;
  - psycho-social and ethical issues in health services management;
  - human resource management in health services;
  - health services planning, including epidemiological studies;

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- recent advances in health care;
- analytical and presentation skills;
- personal attributes of leadership;
- understanding of culture and Indigenous health; and
- leadership
- Evidence provided by an IMG for the assessment of comparability and comparable learning in medical management based on submitted documentation of experience, interview and performance in the presentation of the case study by the Applicant
- Evidence of the Applicant's direct patient care, i.e. at least three years clinical experience that is comparable to the Australian/New Zealand Healthcare system;
- Evidence that the applicant meets the assessment requirements for postgraduate management qualifications that will be compatible with RACMA core academic requirements and competencies as per the following:
  - Health Ethics
  - Health Economics
  - Health Care Systems (specific to Australia)
  - Health Law (specific to Australia)
  - Financial Management in Health
  - Epidemiology and Statistics
  - Research Methodology
  - Leadership

The assessment process should be based on the notion of the community being confident that these specialists are safe to practice and are of an appropriate standard that is consistent with Australasian specialist practicing in medical administration.

#### 8.4 The Interview Process and Structure

The interview is structured for approximately 3 – 4 hours in duration during which the IMG Assessment Panel will discuss with the applicant his/her experience and the applicant will be asked to prepare **two case studies scenarios** (given to the applicant during the interview) for 20 minutes and then present the issues set out in the case study and its resolution for 10 minutes followed by another 10 minutes of questions and answers and discussion. The applicant may also be asked to prepare written submission(s) (such as a coroner's submission outline, or a ministerial brief as part of the assessment). This will normally be required unless there is evidence that those competencies have already been met.

The IMG Assessment Panel will review the referee reports provided with the application for assessment to assist with the determination of comparability and RPL. The Panel may contact the referees if required.

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At the conclusion of the interview, the applicant will be given time to make any comments, seek clarifications in relation to their application, further process and timelines of the outcomes. The IMG Assessment Panel will also provide feedback to the applicant on his/her 'performance' during the interview and the knowledge and competency displayed in the case study presentation. The panel will not advise its decision on the outcome of the interview to the applicant. The applicant and the relevant Registration Authority will be advised if and when the outcome is approved by the Board.

As RACMA does not accredit overseas training programs or posts, the outcome of the assessment process will comprise recommendations based on the level of confidence and evaluation of the IMG Assessment Panel about the credentials and the experience of the applicant seeking specialist recognition. The panel will assess the IMG's application in terms of prior work experience compared to that of an Australian trained medical administrator with a view to determine whether the applicant is:

- Substantially comparable
- Partially comparable
- Not comparable

Depending upon the category of assessment, appropriate further placement, and assessments may be required (refer <u>Attachment 1</u> for options).

#### 8.5 Decision about outcome of assessment process

The IMG Assessment Panel will provide their recommendation to the Censor in Chief. The Censor in Chief will review the process and the content (assessment tools and any written work or comments of the IMG Assessment Panel in response to scenarios) and independently assess and confirm the outcome. The Censor in Chief may seek from the IMG Assessment Panel further clarification. Once the review is complete, the Chair of the BOC will endorse (or not) the recommendations of the IMG panel to the Education and Training Committee for its approval and recommendation to the Board for final approval.

In the event there are changes to the standing IMG Assessment Panel's availability or its membership:

- The Censor in Chief will be consulted in order to constitute and approve a revised Panel
- Moderation will be conducted should there be low or moderate consensus amongst the panel members, or if a decision cannot be reached. Moderation will be sought to determine an outcome. Moderation may involve seeking advice or additional 'experts' at the discretion of the Censor in Chief.
- The College will provide a list of suitably qualified Fellows to choose from in the event the standing IMG assessment panel, or any of its members, is not available. This is to be approved by the ETC.

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## 8.6 Determination of Eligibility for RACMA Fellowship (Substantially Comparable)

Should the IMG Assessment Panel's recommendation be accepted by the Board, Fellowship may be granted on the basis of confirmation that the IMG applicant has met the following:

- met Australian medical board requirements for registration;
- secured an appropriate workplace training post in medical management, under supervision;
- made the necessary payments and applications

# 8.7 Commencing the Fellowship Training Program and Specialist Recognition (partially comparable or not comparable)

Once applicants meet the requirements for registration and training in medical administration, to participate in the Fellowship Training Program they must:

- secure a training post in health service management recognised by the College
- the training post must be accredited by the College if a period of supervised practice is applied
- officially accept the recommendation for a modified Candidacy program and the RPL granted,
- Accept the letter of offer by the College and adhere to the relevant Candidacy enrolment and training fees

Once the Candidate has successfully completed the Fellowship Training Program the College will advise the relevant Australian Regulatory Authority of the applicant's completion of Fellowship requirements. The Medical Board will then either grant or refuse to grant specific registration to practice within Australia in the speciality of medical administration.

#### 9. FEES

Applicants seeking comparability assessment and entry to RACMA Candidacy should refer to the current Fee Schedule on the College website. The fee will include:

- An initial assessment fee comprising an application fee and the fee
- Enrolment and training fees consistent with the pre-requisites for application and participation in the Fellowship Training Program
- All other Candidacy fees for the duration of the Fellowship Training Program to enable Candidates to be in Good Financial Standing and sustain College membership

#### **10. PRIVACY**

In some cases, the College may request additional personal information, referee reports or further details about their training, experience and qualification if further information is required for the purposes of the application. In accordance with the RACMA Privacy Policy and the Privacy Acts for Australia, RACMA will not disclose personal information about the Candidate/Applicant except for those purposes outlined in RACMA Privacy and consent policies and procedures.

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## 11. APPEALS

Applicants who wish to appeal a decision of the College may seek reconsideration and review of College decisions, and may ultimately appeal against this decision, in line with the College Policy for <u>Reconsideration</u>, <u>Review and Appeal of Decisions of the College Committee and Officers</u>.

## **12. DOCUMENTS USED**

The National Registration and Accreditation Scheme; **RACMA Handbook RACMA** Constitution RACMA Policy for Processing Applications for Candidacy (rev) RACMA Policy for Recognition of Prior Learning (rev) **RACMA Medical Leadership and Management Curriculum** RACMA Policy for Reconsideration, Review and Appeal of Decisions of the College Committees and Officers **RACMA Privacy Policy RACMA Policy for Supervised Practice** Medical Board of Australia Good Practice guidelines for the specialist international medical graduate assessment process (Nov 2015) Medical Board of Australia Guide to Specialist Pathway (July 2014) Medical Board of Australia Guidelines for Supervised practice for international medical Graduates - (Jan 2016) http://www.medicalboard.gov.au/Registration/International-Medical-Graduates/supervision - www.medicalboard.gov.au/Registration/International-Medical-Graduates/supervision

## **13. ATTACHMENTS & FORMS**

Attachment 1: AHPRA Definition of Terms Attachment 2: Assessment of International Graduates Specialist Pathway – Report 1 Attachment 3: Assessment of International Graduates Specialist Pathway – Report 2

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