

Friday 5th July 2024

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Executive Officer Medical
AHPRA
GPO Box 9958
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Via: SIMGPathwaysReview@ahpra.gov.au

Dear Executive Officer,

Re: Public Consultation on the Draft Revised Registration Standard: Specialist Registration

The Royal Australasian College of Medical Administrators (RACMA) appreciates the opportunity to provide feedback on the *Draft Revised Registration Standard: Specialist Registration*.

About RACMA

The Royal Australasian College of Medical Administrators – RACMA – is the only specialist medical college that trains doctors to become specialist medical leaders and managers. Our education programs, including our accredited flagship Fellowship Training Program, aim to equip doctors with the leadership and management skills needed to influence and lead Australasian healthcare systems with the explicit aim of improving health outcomes for all peoples of Australia and Aotearoa New Zealand.

RACMA has over 1500 Members across Australia, Aotearoa New Zealand, and Hong Kong. The strength of RACMA is its members, who, through the skills of system leadership, clinical governance and workforce management, strive to lead for change and ensure the delivery of safe and quality healthcare for all. The RACMA membership is a highly regarded medical leadership group as demonstrated by our members' roles and responsibilities within those health systems across the Public Service Sector, Private Health, Primary Health Care, Medical Insurance, Tertiary Sector, Military and beyond. Some of the pivotal roles carried out by our Members include Chief Executives, Chief Medical Officers, Medical Directors, Heads of Departments, Regulatory and Quality Assurance Body Executives and Chairs of key industry and research committees.

RACMA members occupy roles in the health system that consider whole-of-system delivery and are unique in their leadership of health and medical professionals, funding and financing, systems and processes. The impact of that leadership is demonstrated in all public and private settings, primary and tertiary settings and system reform.

Executive Summary

As a leading authority in medical administration, RACMA is committed to ensuring that the standards for specialist registration promote excellence in healthcare delivery and support the professional development of medical practitioners. This submission is made with consideration of the current National Medical Workforce Strategy (NMWS) and the Department of Health and Aged Care (DoHAC)'s focus on improving the numbers and distribution of the generalist and specialist medical workforce.

Given the political and regulatory pressure to establish an expedited pathway for International Medical Graduates (IMGs), it is crucial to address this issue comprehensively. The proposed new pathway, based on section 58(B) of the National Law, aims to streamline the process for IMGs without requiring college assessment, aligning with precedents set in New Zealand and other competent authority countries. This approach also considers recommendations from the Kruk report (Recommendations 9-16).



RACMA strongly supports the need to identify and address issues such as quality of care, workforce security, remuneration, professionalisation, and funding within the medical workforce. The overall development of this part of the economy will be held back unless these issues are addressed. This submission provides detailed responses to the consultation questions and highlights key areas for improvement to ensure a supported and competent IMG workforce.

Response to Consultation Questions

Content and Structure

The draft revised specialist registration standard's content and structure are generally clear and helpful. However, more detailed guidelines on specific aspects such as supervised practice, orientation to the Australian healthcare system, and cultural competency training could enhance clarity and practical implementation.

Specific Content Changes

- **Supervised Practice:** The timeframe of six months of satisfactory supervised practice may not be sufficient for IMGs who are new to Australia. A more extended period might be necessary to ensure full adaptation to the new medical and cultural environment.
- **Cultural Competency Training:** Specific training modules on cultural competency, especially related to Aboriginal and Torres Strait Islander health, should be included in the orientation program to ensure that IMGs are well-prepared to serve diverse communities.

Impact on Patients and Consumers

The proposed changes should consider the potential impacts on vulnerable communities. Ensuring that IMGs have adequate support and supervision will be crucial to maintaining high standards of patient care and safety.

Impact on Aboriginal and Torres Strait Islander Peoples

Including comprehensive cultural safety education and training as part of the registration process will help address any potential gaps in understanding and ensure better healthcare outcomes for Aboriginal and Torres Strait Islander patients.

Regulatory Impacts or Costs

The proposed changes may have implications for supervision resources, particularly in rural and remote areas. Additional support and structured mentorship programs could help mitigate these challenges.

Additional Comments

RACMA supports the introduction of an expedited specialist pathway, provided that robust mechanisms are in place to ensure the competence and safety of practitioners. Collaboration with specialist medical colleges will be essential to implement these changes effectively.

Considerations and Clarifications

We acknowledge the strong views from various colleges regarding this proposed change to specialist registration. A collaborative approach between the colleges, the Federal Government, and Ahpra is essential to maintain professional standards while establishing a supported and competent workforce.



Areas needing further clarification include:

- **Minimum Supervision Requirements:** Clear guidelines on supervision to ensure IMGs receive adequate support.
- **Language and Cultural Competencies:** Enhanced focus on language proficiency and cultural competency.
- **Supervision Supports and Arrangements:** Structured supervisor support systems, particularly in resource-constrained environments.
- **Core Scopes of Practice and CPD Homes:** Ensuring alignment with existing frameworks and continuous professional development opportunities.
- **Management of Underperforming Practitioners:** Clear pathways for remediation and support during the supervisory period.

Dual Perspectives: RACMA and System Administrators

From a RACMA perspective, we have a strong pedigree of supporting IMGs on their pathway to specialist recognition. As system administrators, we are responsible for ensuring a competent and sustainable medical workforce equitably distributed across our health services, ultimately responsible for safety and quality, professional and clinical governance, including local credentialing and scopes of practice.

RACMA endorses the efforts to streamline the registration process for IMGs while maintaining high standards of medical practice. By addressing the specific needs and challenges outlined above, we can ensure that the revised registration standard supports a competent and culturally aware medical workforce. We are committed to working collaboratively with all stakeholders to achieve these goals and ensure the successful implementation of the new pathway.

We look forward to contributing to the ongoing development of the specialist registration standard.

Yours sincerely,

Dr. Helen Parsons CSC FRACMA
RACMA President

