

6/DEC/2010

Submission To

House Standing Committee on Health and Aging

Inquiry into Registration Processes and Support for Overseas Trained Doctors

Re: Terms of Reference One and Three

Dear Committee Members

I am respectfully submitting this information trusting that the committee will act on it in such a way as to improve the accountability and efficiency of the Australian Medical Council in said Council's dealings with Overseas Trained Doctors.

Please note, **you do not have my permission to publish my CV. You do have my permission to publish the rest of this document and the remaining appended documents.**

I am a Canadian-born and trained Psychiatrist and an Australian Citizen, as of 26/October/2005. My curriculum vitae is attached (**Document 1**), outlining my qualifications and experiences. Please note that I have been an Assistant Professor in five Medical Schools in the United States and Canada and have many hundreds of hours of Continuing Professional Development, after becoming a Psychiatrist (evidentiary materials available on request).

My medical and psychiatric qualifications were completely examined and approved (**First Time**) prior to the offer of a contract with the Health Commission of Victoria, later known as the Office of Psychiatric Services, for whom I worked in three venues, Beechworth, Geelong and Dandenong, between 01/March/83 and 28/February/87, under a Victorian Temporary License. My performance was considered quite satisfactory (evidentiary letter available on request)

My medical and psychiatric qualifications were again completely examined and approved (**Second Time**) prior to me getting my current job as a Consultant Psychiatrist with the North Metropolitan Adult Mental Health Service, Perth, Western Australia, which began in September 2006 and ends in September 2011, under a Western Australian Conditional Registration. I have had three different supervising Psychiatric Heads of Service, all of whom have assessed my performance as exceeding expectations (evidentiary yearly evaluations available on request).

The Australian Medical Council (AMC) has set up a mechanism for Overseas Trained Doctors from Canada, United States, New Zealand and UK, to acquire a General License to practice

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Medicine in Australia via the **Competent Authority Pathway**. As part of the process to acquire a certificate to practice, the Australian Medical Council (AMC) has contracted, since 2006 (if I interpreted the AMC website correctly), with their agent, The Educational Commission for Foreign Medical Graduates (ECFMG), in the USA, to verify the medical school qualifications of the Overseas Trained Doctors. The ECFMG “established the International Credential Services (EICS) in 2000 to assist international medical registration authorities in obtaining primary - source verification of medical education and registration credentials of physicians applying for licensure whose medical education was completed outside their jurisdictions” (quote from the ECFMG website).

On **23/July/2009** I submitted my completed application form for the Competent Authority Pathway Assessment by registered mail, with the associated \$825AUD fee, to the AMC. Although the AMC did not publish any time frame for the completion of the verification of my medical qualification, it would seem reasonable that this could be done within two to four months. **As of this date, 6/December/2010, the AMC has not completed this task and has not yet issued the Certificate.**

Below, please see my summary of the communications I have had with the AMC and with my Medical School, the University of Manitoba, in Winnipeg, Manitoba, Canada.

On **4/January/2010**, I sent a letter to the AMC requesting some indication as to the date of the expected determination of my application.

On **7/January/2010** I received an e-mail from the AMC indicating that they had received my letter.

On **10/February/2010**, I received a letter from the AMC indicating that my Competent Authority Pathway Certificate would be issued within “**six to eight weeks**”

On **15/February/2010** I received an e-mail from the AMC Administrative Unit, indicating that they had received my correspondence on “15/02/2010”, and that had “been forwarded to the appropriate section of the AMC for further processing”.

On **10/May/2010** I received an e-mail from the AMC indicating, “It does appear your certificate has gone outside usual processing times, and there are no notes to indicate a known problem” “you will receive a reply from the assessing section over the next few days with an update”. I received no such reply.

I e-mailed the AMC on **3/June/2010**, received no reply then e-mailed the AMC on **14/June/2010**. I received no reply. I re-e-mailed the AMC on **23/June/2010** to inform them

that I had contacted the Royal College of Physicians and Surgeons of Canada regarding the behaviour of the AMC.

On **25/June/2010**, I received an e-mail from the AMC Primary Source Verification Section (**Document 2, "Competent Authority application -1"**) indicating that the February 2010 communication had been an **error** and that my medical degree had yet to be verified. The AMC was going to "advise ECFMG to send another reminder to (my) University so they can verify (my) primary degree"

On **28/June/2010**, I replied to the AMC (**Document 3, "Competent Authority application-2"**) and to avoid repetition please see the details in that document.

Not having had a reply from the AMC, I again e-mailed them on **1/August/2010 (Document 4, "Competent Authority Pathway Certificate ")** and to avoid repetition please see the details in that document.

The reply I received from the AMC Primary Source Verification Section on **5/August/2010, (Document 5, "Competent Authority Pathway Certificate-2")** was an explanation regarding why the ECFMG was involved and a request for me to contact my University to request that the verification be provided to the ECFMG at the earliest possible time. "We will continue to communicate with the ECFMG to seek urgent verification from the University of Manitoba to attempt to further assist you" (underlining mine, see below).

On **10/August/2010** I received an e-mail from

Faculty of Medicine, University of Manitoba, indicating "I can also verify that I have not received any requests to process a request on your behalf in the 16 months I have been here". (for verification of my medical degree)

On **10/August/2010**, I received the next communication from the AMC (**Document 6, 'EICS verification')** . Please refer to that.

Please see my reply to the AMC in an e-mail dated **10/August/2010, (Document 7, "Re: EICS verification")** ! In answer to my 10 August 2010 e-mail, on **11/ August/ 2010, [REDACTED]**, in another e-mail, indicated that the Postgraduate Medical Education Office would have immediately transferred any medical-degree-verification request to her in the Undergraduate Medical Education Office and that there was **no historical record of any request for verification of my qualification!** This clearly indicates that it has **not** been the University of Manitoba which has held up this process and that **the faults and delays involve the AMC and its agent, the ECFMG.**

In order to resolve this protracted frustration, **I promptly paid the \$50 Canadian fee to the University of Manitoba on 10 August 2010**, despite the fact that the instructions pertaining to the Competent Authority Pathway Application did not indicate that it would be necessary for the applicant to personally pay the Medical School fee for the processing of the verification. In other words, the \$825AUD fee was apparently meant to cover all the transactions.

In e-mails to me dated **11/August/2010** and **18/August/2010**, _____ assured me that she was attempting to get the "proper" papers from the ECFMG. She did not receive them until **2/September/2010, on which date she sent the ECFMG International Credential Service confirmation of my medical school undergraduate medical education.**

What followed next was an e-mail from the AMC on **3/November/2010**, instructing me to send, within three weeks, the \$50 verification fee to the University of Manitoba !! I immediately e-mailed _____ asking for verification that the fee had been paid and asking for copies of her communications with the ECFMG. She replied that everything was in order.

The last communication from the University of Manitoba, the penultimate expression of the incompetence of the ECFMG has to be read to be believed (**Document 8, FW: Australian Medical Council**"). _____ integrity has been questioned in yet another example of the complete failure of the AMC's agent, the ECFMG, to assume responsibility for delays. **has been the only person in this whole process with any integrity and true desire to resolve this matter.**

I repeat: **As of this date I still do not have the certificate from the AMC, and frankly am waiting for the next show of incompetence or round of excuses.**

My analysis, commentary and questions follow.

- 1) If I had not written to the AMC on **4/January/10**, when, if ever, would the AMC have realized that my application was not being properly processed?
- 2) After the **10/May/2010** AMC admission that " your certificate has gone outside usual processing times, and there are no notes to indicate a known problem", why has it taken **seven more months, so far**, and why do I not yet have the certificate ? (Especially considering the many efforts of myself and _____ to resolve this process.)
- 3) What are the reasons for this unconscionable tardiness, given that the AMC and ECFMG have had 3+ years to work out procedures, lines of communication and accountability, workflow procedures and other technical matters within and between their organizations, in order to process applications in a timely manner?

4) I hold the AMC totally responsible for all the delays,

for not realizing that the ECFMG had not approached the University of Manitoba Undergraduate Medical Education Office with **any** request for verification **since 23/July/2009,**

for failure of the AMC and ECFMG to apply the portion of the \$825AUD application fee to cover the cost of the verification fee for the University of Manitoba, or alternatively for the AMC's failure to indicate upfront to the applicant what extra fees would be payable and for what reason.

for the ECFMG shifting the responsibility to the Medical School for requesting the proper documents, instead of providing them in a prompt manner to said Medical School,

for the inefficiency and unprofessional behavior of the ECFMG, especially after sent **all** of the proper verification documentation to the ECFMG on **2/September/2010,**

for failure to act promptly after admitting processing outside the usual timeframe,

for failure to responsibly respond in a timely manner to e-mails

for shifting the burden of resolution of this problem onto myself and

for blaming the Medical School and/or the ECFMG for any of the delays, instead of taking responsibility for those delays,

for the obstructionistic, disrespectful attitude toward myself inherent in these delays,

for using misleading terminology/phraseology, as in **Document 5**, as it was already clear that AMC had **not** been communicating efficiently with the ECFMG, had **not** been acting with a sense of urgency and in **no way** were assisting me,

for the internal disorganization and procedural inefficiencies which could lead to such a horrendous delay,

and for any future consequences that these delays entail, as I must, before September 2011, as a next step, have my **Psychiatric** qualifications re-examined **for the third time** to determine if the Royal Australian and New Zealand College of Psychiatrists will validate them without further training or examinations.

Resolution of this matter and Recommendations

- 1) If the AMC has any integrity, I would expect that organization to send a letter of apology to _____ and to myself for the incredible impositions and inconveniences and for the attendant emotional distress caused by the inefficiencies.
- 2) If the AMC has any integrity, I would expect that organization to refund me the whole of the \$825 Australian application fee, out of recognition for the suffering, imposition and inconvenience inflicted on me by the AMC's behaviour. (Please note that _____, on behalf of the University of Manitoba, magnanimously waved the \$50 Canadian medical-verification fee to ease the distress I have faced in this process. The University of Manitoba did not have to do this. The second AMC request for me to pay the fee represents the AMC's inefficiency and is not directly related to the generosity of _____, as the request for the fee would have had to have come from the Undergraduate Medical Education Office, _____ office !!)
- 3) It is apparent that the AMC needs to have a complete review of its internal processes, workflow practices, procedures for ensuring timely communications and procedures for assuring accountability.
- 4) Given the shortage of physician numbers and of certain specialists, including Psychiatrists, in Australia, the AMC would do well to re-examine its attitudes about OTD's and promptly terminate any obstructive, disrespectful, passive aggressive, superior or other maladaptive behaviors in their dealings with Overseas Trained Doctors. (I am absolutely certain that were I to seek medical licensure with my Canadian qualifications in any "third-world" country, the process would be expedited within **weeks**. Most assuredly if I were an overseas internationally-recognized athlete with Olympic prospects for Australia, seeking to continue my profession as an electrician, my qualifications would most likely be instantly recognized!!)
- 5) The AMC needs to re-examine its relationship with the ECFMG and all aspects of their contract, the lines of accountability and practices for procedural efficiency and timeliness.
- 6) The qualifications of any OTD already verified by the AMC prior to the AMCs involvement with the ECFMG should not need to be re-verified, if that OTD seeks a Competent Pathway Certificate or any other access to training or examinations in pursuit of an Australian Medical License.
- 7) I recommend that a Governmental body **continuously, actively** monitor the performance of the AMC in its dealings with OTD's to better serve the needs of the Australian public.

Finally, I would like to thank the Committee so very much for this opportunity to present this submission. If for any reason it is determined that this submission does not fall under the terms of reference of this Committee, please advise me immediately about the appropriate Governmental body to whom I can report these issues.

I hope that this submission is of assistance to the Committee in establishing an honorable, efficient, nondiscriminatory and professional process to deal with OTD's and their desire to serve the Australian public.

Respectfully submitted,

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