



The Royal Australian and New Zealand College of Ophthalmologists

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Standing Committee on Health and Ageing
House of Representatives
PO Box 6021
Parliament House
CANBERRA ACT 2600

Submission No. 73
(Overseas Trained Doctors)
Date: 16/02/2011

Dear Mr Ali

Ref: Inquiry into Registration Processes and Support for Overseas Trained Doctors (OTDs).

Thank you for the opportunity to comment on the registration processes and support for Overseas Trained Doctors (OTDs). RANZCO addresses the Terms of Reference listed for the Standing Committee on Health and Ageing below.

1) Explore current administrative processes and accountability measures to determine if there are ways OTDs could better understand colleges' assessment processes...

The College recommends that all stakeholders involved in the OTS process work together to determine the best administrative processes and accountability measures for the assessment of OTDs.

RANZCO, as part of the nationally consistent assessment process adopted by all Colleges, assesses an OTD's comparability against the standard of recently trained Australian ophthalmologists.

- *"The purpose of the specialist assessment procedure is to determine the level of comparability of overseas-trained specialists' training and qualifications with those of Australian recently trained specialists"*
- *"The standard applied to the assessment of overseas-trained specialists is the standard required for admission to the relevant specialist medical college as a Fellow"*

(AMC website)

The College has recently reviewed its OTD assessment process, requesting input from all levels of the College bureaucracy and the Australian Medical Council. The College's overseas trained specialist committee is made up of Fellows who are involved in the vocational training program, overseas trained specialists, directors of training, examiners, and others. The following tools are used to present information to OTDs about RANZCO's assessment process:



- A link on the RANZCO website to the Australian Medical Council's (AMC) website and information on the available AMC assessment pathways
- RANZCO website which presents specific Standard Pathway and Area of Need (AoN) Pathway information, and additional general information about this College's assessment process (<http://www.ranzco.edu/advice/amc-assessment-standard-or-area-of-need/>)
- Correspondence regarding the role of various stakeholders involved in the OTS process and the role of the College
- One-on-one meetings between the College Manager and individual OTDs
- Responses to direct inquiries from OTDs by email or telephone

The College has employed a dedicated staff member to administer the assessment scheme. This manager works with the experienced members of the OTS committee, who all operate in a pro bono capacity.

The College recommends that all jurisdictions should sign off on their role in the assessment process: the AMC, the Medical Board of Australia (MBA), and the relevant College. In the case of an AoN application, the State government and the employer should be added to this list. This would ensure a clear delineation of roles and accountability, offering clarity to the OTD, jurisdictions, and the community.

1a) ...appeal mechanisms could be clarified...

The College has its appeals mechanism published on the website and provides a direct link for OTDs to the relevant policy document in the section outlining the appeals process.

The College recommends that an appeal against a College decision should be submitted to the AMC as the administrator of the assessment process. The AMC can then consider its response to the appeal, which may include asking the relevant College to review its decision. This approach reinforces the fact that it is the AMC who administrates the assessment process and advises the Medical Board of Australia on a decision about registration (acting in part on the advice of a College).

The College itself is not involved in the registration process.

This enables transparency between agencies, aids communication between the administrative and registering bodies and the applicant, and reduces the possibility of conflict and confusion between the applicant and the College.

1b) ...and the community better understand and accept registration decisions;

The assessment process for OTDs is a team effort including most or all of the following organisations:

- Australian Medical Council
- Joint Standing Committee for Overseas Trained Specialists
- The relevant specialist medical college
- Australian Health Practitioner Regulation Agency – Medical Board of Australia
- Medicare
- Department of Immigration & Citizenship
- State Health Departments
- Employers (for Area of Need positions)



The College suggests that the Department of Health and Ageing (DoHA), the Medical Board of Australia and other jurisdictions work together to proactively raise the profile of this complex assessment process and the roles of each of the agencies listed.

It is also important that Governments are vocal in their support of the AMC, the Colleges, and the OTD assessment process. As recommended by the ACCC and the AMC, Colleges are required to determine the level of comparability of an OTD's qualifications, training and experience with those of recently trained Australian doctors. This is required in order to provide a high and consistent standard of care in service provision across the healthcare industry. This should also provide the community with confidence about the fairness and effectiveness of the assessment system.

This requirement is not understood by the general public, and particularly causes misconceptions in the Area of Need assessment process. An Area of Need assessment only assesses an OTD's skills and experience against a job description in a particular geographic area, by review of printed material supplied by the OTD, and an interview.

Colleges have had problems when such candidates are considered for renewal of their AoN status or consideration for full comparability (standard assessment pathway), in particular when the doctor may not have received adequate supervision and support from the State Government and the OTD's employer, or when the OTD is not able to demonstrate substantial comparability when assessed on the standard assessment pathway.

This issue can be a specific problem within the specialty of ophthalmology as all Australian ophthalmologists are trained as generalist ophthalmologists, not sub-specialists. General ophthalmology is the standard applied to the assessment of specialist ophthalmologist OTDs, and thus an OTD filling a sub-specialist role satisfactorily (i.e.: cataract surgery only) may not be able to be found substantially comparable to an Australian trained ophthalmologist when assessed against general ophthalmology criteria.

Further, the College maintains that the community would understand and accept registration decisions if, in dealing with the press and other public communications, the relevant parties made it clear that ongoing registration for an OTD is decided by the Medical Board of Australia on advice from the AMC, and not by the College itself. This would place a greater level of authority on the decision, and would reduce the tendency for the press to demonise the Colleges and accuse them of restricting entry of new doctors to their specialty. The College takes pride in the fairness and transparency of its decisions made in good faith, and feels that the MBA and the AMC should be public in defending such processes undertaken at their request.

The College suggests that the Department of Health and Ageing, in their promotion of the health system, include in their advertising campaign a mention of OTDs, their contribution to rural and remote Australia, and the fact that they have been favourably assessed against the standard required in Australia which ensures patient safety.

The College, as part of its communication strategy, will be disseminating information to the public on what an Area of Need is and requires, via the College website, continued communication with local members of parliament, local economic development boards and the media. The promotion will also explain the assessment process for an Area of Need, in comparison to a full standard OTD assessment.



2) Report on the support programs available through the Commonwealth and State and Territory governments, professional organisations and colleges to assist OTDs to meet registration requirements, and provide suggestions for the enhancement and integration of these programs;

The College suggests that an Australian orientation program covering cultural and medical practice considerations be administered by the Medical Board of Australia as a compulsory requirement prior to being eligible for any type of medical registration.

The Royal Australasian College of Physicians, in collaboration with the Department of Health and Ageing, have developed an online orientation program for OTDs which aids their adjustment to living and working in Australia. In the interests of the applicant, the College recommends that this opportunity to work with DoHA in this capacity be funded and rolled out to all Colleges.

The College also suggests additional support for OTDs in the provision of funding for hospital training, supervision, and assessment places in order for OTDs to complete their assessment requirements more efficiently.

3) Suggest ways to remove impediments and promote pathways for OTDs to achieve full Australian qualification, particularly in regional areas, without lowering the necessary standards required by colleges and regulatory bodies.

OTDs who are working in AoN positions should be able to leave their practices at least three times per year to attend development and teaching activities, be able to network, and be able to build relationships with their peers in this country.

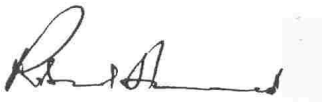
This would require funding for locums to attend to the sponsoring practices in the OTDs absence, and for such a stipulation to be made a condition of their registration and employment. In addition, a Continuing Professional Development fund (not unlike that developed for rural GPs) should be developed to ensure an income for OTDs while out of practice.

OTDs in AoN positions should also have compulsory assessment preparation and study time built into their practice timetable. Employing sponsors should be closely regulated by the Medical Board of Australia to ensure that this time is sanctioned.

RANZCO is working towards providing access to continuing education programs for OTDs working in AoN positions, and to provide support to facilitate their preparation for any assessment tasks that are required. It is crucial that any OTS program is well co-ordinated and supported by funding for this to occur. Colleges are extremely well placed to develop support tools, mentoring and training sessions. The cooperation of employers in providing opportunities for such doctors to take part in these activities would be of great value to the OTD, and to the employer.

Please contact the College if any additional information is required. We look forward to hearing the outcome of the review.

Yours sincerely



Dr Richard Stawell
President, RANZCO



Ms Susi Tegen
CEO, RANZCO

