

**Submission No. 96**  
(Overseas Trained Doctors)  
Date: 21/02/2011



**SUBMISSION TO THE AUSTRALIAN  
HOUSE STANDING COMMITTEE ON  
HEALTH AND AGEING**

**INQUIRY INTO REGISTRATION  
PROCESSES AND SUPPORT FOR  
OVERSEAS TRAINED DOCTORS**

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**GOVERNMENT OF SOUTH AUSTRALIA**  
February 2011

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## **Introduction**

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The Government of South Australia welcomes the opportunity to make the following submission to the Inquiry into Registration Processes and Support for Overseas Trained Doctors (OTDs).

On 23 November 2010, the Minister for Health and Ageing, Hon Nicola Roxon MP, asked the Committee to inquire into and report on Registration Processes and Support for OTDs.

Recognising the vital role of colleges in setting and maintaining high standards for the registration of OTDs, the Committee will:

- 1) Explore current administrative processes and accountability measures to determine if there are ways OTDs could better understand colleges' assessment processes, appeal mechanisms could be clarified, and the community better understand and accept registration decisions.
- 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.
- 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.

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## **Key Messages**

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1. Improving the administrative processes and communication of colleges and the Australian Health Practitioner Regulation Agency (AHPRA) would reduce processing times and assist OTDs and employers to better understand assessment processes and registration decisions.
2. Leadership and coordination is required in supporting OTDs to achieve registration and fellowship and become well integrated within the Australian healthcare system. Both pre-exam preparation and personal development within the Australian healthcare context is required. Health Workforce Australia is appropriately placed to undertake this work.

3. A pathway could be developed to recognise experienced OTDs that have sub-specialised skills and qualifications. This would remove the requirement for these professionals to re-train at a lower level simply to practice as a specialist in Australia; allow these OTDs to be recognised for their specific qualifications, and allow them to be given an equivalent standard of recognition within their scope of practice.

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## Addressing the Terms of Reference

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### ***1) Explore current administrative processes and accountability measures to determine if there are ways OTDs could better understand colleges' assessment processes, appeal mechanisms could be clarified, and the community better understand and accept registration decisions***

The administrative processes of the colleges can be cumbersome and time consuming and it is not unusual for an OTD to wait up to 12 months for assessment of specialist qualification (depending on the college and whether an interview is required). Some colleges provide a significant amount of information and support for OTDs but this varies depending on the specialty. Administrative processes could be improved if the Australian Medical Council (AMC) required colleges to conform to a standard communication format, assessment process (as much as possible), and agreed processing times.

Since its inception on 1 July 2010, AHPRA has faced a series of challenges to ensure that it operates and communicates with OTDs and employers in a timely and efficient manner. AHPRA can continue to improve its service by:

- Undertaking further planning and consultation into the service needs of clients to ensure its business practises and processing forms are meeting these needs.
- Providing additional training to AHPRA personnel, to ensure they can provide clients with consistent advice and information in a timely manner.
- Allowing OTDs and employers to liaise directly with State based AHPRA registration personnel when call centre staff are unable to assist with queries. This has improved in South Australia since the introduction of the SA-URGENT email inbox.
- Vesting further delegations in State based registration personnel to further reduce processing times. Client pressure has resulted in some delegations to allow registration decisions to be vested in the State based Registration Manager.

- Implementing service standards to clearly state the organisation's turnaround time for answering client queries and processing applications.
- Introducing a simple receipt message to be sent to the relevant employer at the time an application is submitted in respect of an OTD. The message could show a checklist of items required for the application, indicating which ones were outstanding or incomplete. A feedback system would greatly improve understanding.

Implementing these options would assist employers and OTDs to better understand the AHPRA process and reduce processing times.

***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***

An effective education and personal development support program needs to be developed to ensure OTDs achieve registration and fellowship and become well integrated within the Australian healthcare system.

Leadership is required in supporting OTDs to achieve registration requirements. This is partly because no one 'owns' this pre-registered group other than recruiters or recruitment companies. Most college support programs are aimed at fellowship exam preparation.

The South Australian Government has an interest in overseas trained senior consultants – in particular general surgeons, general physicians, rural procedural general practitioners and emergency physicians. Recognising the significant shortage of rural general practitioners and procedural general practitioners, the South Australian Government, through SA Health, partly funds the Rural Doctors Workforce Agency to run OTD support programs to support attainment of the Fellowship of the Royal Australian College of General Practitioners and Fellowship of the Australian College of Rural and Remote Medicine.

There is a significant gap in coordinated education support for OTDs in general practice. OTDs are required to work and study for their exam but have no personal guidance to help them. This contributes to the higher failure rate for OTDs compared to doctors as registrars in a Regional Training Provider program.

Support programs should focus not only on pre-exam preparation for OTDs but also on personal development within the Australian healthcare context. This will improve how effectively OTDs integrate into rural South Australia. As more Australian based and educated doctors graduate as general practitioners, some OTDs will struggle to compete and may be forced to work in more remote or less attractive localities where they may not be well adapted to these practices. Better coordinated support programs for OTDs will

reduce the exam failure rate and ensure OTDs continue to integrate well into a South Australian practice.

The State Office of the Royal Australian College of General Practitioners has developed a good example of an effective program in South Australia. They run an exam preparation and communications workshop series targeted at OTDs undertaking (or about to undertake) the AMC certification process in South Australia.

Further work coordinating and clarifying support programs for OTDs could be undertaken by the recently established Health Workforce Australia, which has the remit and resources to work on these issues.

***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***

In some cases, highly qualified specialists from overseas have failed to gain specialist qualifications because of college requirements that they sit a fellowship exam, despite the fact that they work within a specific sub-speciality and will not realistically practice within the full scope of the fellowship. The following example illustrates this issue:

- A highly qualified burns specialist moves to South Australia from overseas to work. In order to gain specialist qualifications, the OTD is advised by the college to sit the fellowship exam. The exam covers a much broader scope of lower level skills within the speciality. This would require the highly qualified burns specialist to re-train in a broad range of basic areas in which they have no desire to work. Without passing the fellowship exam, the OTD cannot be employed on the specialist salary.

This presents a risk of the OTD moving back overseas, as it is highly likely they would not be prepared to re-train in a broad range of basic areas. A pathway could be developed that allows OTDs with specific sub-specialist qualifications to be recognised for their specific skills and given an equivalent standard of recognition within their scope of practice.

