



AACP

AUSTRALIAN ASSOCIATION
OF CONSULTANT PHYSICIANS

SUBMISSION

from the

**AUSTRALIAN ASSOCIATION
OF CONSULTANT PHYSICIANS**

in relation to the

**Proposed arrangements for specialists within the National
Registration and Accreditation Scheme for the Health Professions**

February 2009

The Australian Association of Consultant Physicians (AACP) wishes to comment on a number of aspects concerning the proposed arrangements as they may apply to consultant physicians and paediatricians (CPP).

While the proposal to streamline medical registration has many merits, there are aspects of the proposed arrangements that are of concern. The delivery of safe, high quality medical services to the Australian community is fundamental in Australia's health system and this is supported by a robust registration and specialist recognition arrangement. As currently outlined, there are some concerns within the proposed "Arrangements for Specialists", namely:

- the relative lack of information provided about the arrangements,
- the apparent lack of involvement, or even acknowledgement of the role, of medical colleges, societies and associations that currently are a source of advice and expertise in relation to the qualifications and expertise of medical specialists (in this case CPP) to the Government;
- the apparent focus more on standardised training, rather than the capabilities of the individual seeking to be registered (whether that be as a general practitioner or as a specialist or CPP);
- for defined areas of need, the provision for boards to have the ability to determine professional standards;
- the proposition of having the widest possible capacity for registration "consistent with public safety";
- it is unclear what is being proposed in relation to "continuing competence" or "continuing professional development".

Medical Colleges / Societies / Associations

As set out in the discussion document, medical colleges, societies and associations that currently have a significant role in relation to the assessment of the qualifications and experience of medical specialists, appear to be absent from the proposed future arrangements. This is a major concern given that it is these organisations that understand most clearly the requirements for training, continuing professional development and appropriate practice. Furthermore, it is these organisations to which governments have most frequently turned for advice about such matters.

There should be a central role for medical colleges, societies and associations in any scheme that seeks to assess or approve the training and experience of individual doctors, particularly where there are highly specialised elements of practice to be considered.

The AACP urges the Australian Health Ministers' Advisory Council (AHMAC) to retain the valuable experience of organisations in any future registration or "endorsement" arrangements.

Boards to determine professional standards in "area of need" situations and to have the "widest possible capacity" for registration

The arrangements propose that the national legislation will allow a board to identify a sub-group of practitioners "who have specific training and are considered qualified to deliver a particular type of service that they would otherwise be prevented by law from delivering". Specifically, the proposal is that the boards "must consider applications for

registration ... where the applicant is not eligible for registration in any other category of registration” and that the boards “may develop professional standards in respect of the registration requirements to apply to area of need registration to support a nationally consistent approach”.

This proposition raises a number of issues: (i) the registration of an individual who would not otherwise be registrable; (ii) the apparent provision for boards to develop professional standards to apply in area of need registration that will be different to those applicable otherwise; and (iii) the proposition that a second layer of registration standards will support “a nationally consistent approach” – in the latter, it is difficult to see how this will be the case.

In recent times, the registration of individuals for address area of need situations has led to catastrophic outcomes for the safe care of members of the Australian community. It is not clear from the description of the proposed arrangements how a scheme that potentially lowers the standard for a sub-group of individuals can do anything but potentially compromise the standard of care. The AACP urges the AHMAC to review this proposal to ensure that only those with appropriate qualifications and experience are registered to practice in any part of the Australian community.

Ministerial Council / Board approval of specialist endorsement

Under the proposed arrangements provision is made for the Ministerial Council to approve accreditation standards for medical education and training courses, including specialist training. It is unclear why an additional layer of approval of the “standards for qualifications” for the purposes of specialist endorsement may be required and clarification of this component is sought.

Continuing competence and/or continuing professional development requirements

The current documentation in relation to continuing competence and continuing professional development requirements does not provide sufficient information as to the proposed arrangements. Competence and professional education/development are not the same, nor can they be demonstrated in the same way.

Furthermore, the proposal that the “national boards ... develop and publish minimum standards (approved by the Ministerial Council)” fails to acknowledge the important role of the medical colleges, societies and associations, as noted above, in relation not only to training, but also to continuing professional development and the assessment of competence. The AACP believes this element of the arrangements requires further development and particularly requires the input and ongoing involvement of the medical colleges, societies and associations in order to develop a robust and workable arrangement.

The AACP believes that the medical and specialist registration arrangements need to be founded on recognition of accepted training and experience, with the involvement of those bodies that clearly have the competence to properly assess such training and experience in an objective manner. The health and safety of the Australian community deserves no less.