



**A.N.Z.A.P.N.M**

Australian and New Zealand Association of Physicians in Nuclear Medicine (Inc)

**SUBMISSION**

from the

**AUSTRALIAN AND NEW ZEALAND ASSOCIATION  
OF PHYSICIANS IN NUCLEAR MEDICINE**

on the

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

**February 2009**

## **Introduction**

The Australian and New Zealand Association of Physicians in Nuclear Medicine (ANZAPNM) appreciates the opportunity to comment on the proposed arrangements as they may apply to consultant physicians and specialists in nuclear medicine.

Streamlining medical registration has many merits given the current multiple entry points to registration. However, the ANZAPNM is concerned with some aspects of the proposed arrangements. The provision of safe, high quality medical services is fundamental in Australia's health system and have been supported by a stringent registration and specialist recognition process that, for the most part, results in only those with appropriate training and qualifications being appropriately recognised. While there have been instances where the system has failed, fortunately this has been relatively uncommon. The problem is that such failure, in some specialties, can have very grave outcomes. It is in the interests of the Australian community to ensure that specialist registration/recognition is handled properly, and with the advice of organisations and individuals who have relevant knowledge of the specialty.

The ANZAPNM has concerns with the proposed "Arrangements for Specialists". These include:

- insufficient detail on a number of aspects the proposed arrangements on which to make recommendations;
- the fact that there is no acknowledgement of the role of medical colleges, societies and associations as the prime source of advice and expertise in relation to the qualifications and expertise of medical practitioners to the Government;
- the apparent focus on "standardised training", rather than the capabilities of the individual seeking to be registered (whether that be as a general practitioner or as a consultant physician or medical specialist);
- the proposal that the boards will have the ability to determine professional standards for medical specialists being registered for "areas of need";
- the proposition that the boards will have the widest possible capacity for registration "consistent with public safety";
- the lack of clarity in the proposed arrangements regarding "continuing competence" or "continuing professional development".

## **The role of Medical Colleges, Professional Societies and Professional Associations**

It appears from the discussion document that medical colleges, societies and associations will 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 across the medical profession. Furthermore, it is these organisations to which governments have most frequently turned for advice about such matters and which have a significant role in the assessment of qualifications for both registration and recognition.

It is imperative that there is a central role for medical colleges, professional societies and professional 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, including unique risks to patient health and safety, to be considered.

In the case of nuclear medicine, the ANZAPNM manages the nuclear medicine credentialing program that was established at the request of the Commonwealth Government in order to ensure that public funding was not expended on nuclear medicine services provided by medical practitioners who were not appropriately qualified and recognised. The ANZAPNM believes this process has been valuable in ensuring that specialists that work in any area with special occupational health and safety needs, for both patients and staff, are properly qualified, experienced and recognised.

The ANZAPNM considers it essential that the Australian Health Ministers' Advisory Council (AHMAC) retains the invaluable experience of professional organisations in any future registration or "endorsement" arrangements.

### **The provision for the boards to determine professional standards in "area of need" situations**

The proposed arrangements include provisions such that a board may 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". As such, where a board "must consider applications for registration ... where the applicant is not eligible for registration in any other category of registration" the board "may develop professional standards in respect of the registration requirements to apply to area of need registration to support a nationally consistent approach".

This proposal raises significant concerns, including the provision to allow the registration of an individual who would not otherwise be registrable and apparently the provision for a board to develop the professional standards to apply in area of need registration that may well be different to those applicable otherwise. These provisions fly in the face of consistency and ensuring a comparable standard of care to patients in different areas. The further proposition that a second layer of registration standards will support "a nationally consistent approach" would appear to contradict the notion of national consistency of outcome.

There have been a number of recent cases where the registration of individuals for area of need situations has led to some catastrophic outcomes. The description of the proposed arrangements does not clarify how a scheme that potentially lowers the standard for a sub-group of individuals can avoid compromising standards of care. The ANZAPNM recommends strongly that the AHMAC to review this proposal and ensure that only those medical practitioners who have appropriate qualifications and experience can be registered and/or recognised to practice in any part of the Australian community.

### **Approval of specialist endorsement by the Ministerial Council or Board**

Provision appears to have been made for the Ministerial Council to approve accreditation standards for medical education and training courses, including that for medical specialists. It is not clear from the documentation why the proposed arrangement appears to include an additional layer of approval of the "standards for qualifications" for the purposes of specialist endorsement may be required; the ANZAPNM requests clarification of the rationale for this component.

### **The requirements for continuing competence and/or continuing professional development**

The currently proposed provisions in relation to continuing competence and continuing professional development is not sufficiently detailed to allow us to comment. However, we would note competence and professional education/development are not the same,

nor can their achievement be demonstrated in the same way. The documentation does not specify how “competence”, in particular, can be assessed under the proposed arrangements. The ANZAPNM has had concerns in the past about requiring specialists to demonstrate adherence to appropriate practice; this has proved a very difficult concept and we believe demonstration of “competence” to a regulator in the manner possibly envisaged will be equally difficult.

The further proposal that the “national boards ... develop and publish minimum standards (approved by the Ministerial Council)” again fails to acknowledge the crucial role of the medical colleges, professional societies and professional associations, as noted above, in relation not only to training, but also to the development of continuing professional development requirements. The ANZAPNM believes this proposal requires further development, and the input and ongoing involvement of the medical colleges, professional societies and professional associations will be essential if a robust and workable arrangement is to be developed.

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. Such recognition and involvement are essential if the AHMAC is to develop an efficient, defensible national registration system that protects the health and safety of all Australians.