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AUSTRALIAN AND NEW ZEALAND  
COLLEGE OF ANAESTHETISTS

ABN 82 055 042 852

Joint Faculty of Intensive Care Medicine  
Faculty of Pain Medicine

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Ms Bronwyn Nardi  
Chair  
Practitioner Regulation Subcommittee  
Health Workforce Principal Committee  
HWPC Secretariat  
Level 12/120 Spencer St  
Melbourne VIC 3000  
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Dear Ms Nardi

**Australian and New Zealand College of Anaesthetists Submission**

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

The Australian and New Zealand College of Anaesthetists (ANZCA) is pleased to provide a further submission in relation to the National Registration and Accreditation (NRA) Scheme for Health Professionals ("the Scheme"). This submission is in response to the consultation paper on the proposed arrangements for specialists within the Scheme.

As highlighted in our previous submissions, ANZCA welcomes the introduction of a national registration scheme for the health professions and the benefits it will bring to the Australian public. We have, however, major concerns regarding proposed accreditation processes which should be independent of government to ensure patient safety and equity of access, as recommended by the World Health Organisation (WHO) and World Federation for Medical Education (WFME).

We welcome the changes made in relation to health professional boards being required to consult with other boards and have input into proposals to extend scopes of practice. We also echo the comments provided by the College of Presidents of Medical Colleges (CPMC) in relation to this consultation paper and make the following points:

- A national uniform registration process should have a separate specialist register for specialist medical practitioners, in addition to the general register for medical practitioners who do not possess approved specialist qualifications, training and experience.
- Entry to the specialist register must be limited to health practitioners with approved qualifications on advice from the relevant accredited specialist body. For medical practitioners, this would be the relevant medical college, which has been accredited by the Australian Medical Council for this (and other) purposes.
- Medical specialist colleges must continue to play an important prevocational and specialist training role, including accreditation of training, ensuring the highest clinical standards and assessing competencies to protect patient safety.
- Continuing Professional Development (CPD) should be the term used rather than Continuing Competence, and CPD should be compulsory for all registered medical practitioners.
- ANZCA continues to have concerns about the proposed role for the Ministerial Council. We continue to submit that Government should set legislation and that independent statutory bodies be responsible for its implementation.

### ***Specialist endorsement***

ANZCA does not agree with the proposed endorsement of the national register for medical specialists. We believe that in order to protect the public there must be a separate register of specialists, as is currently the case for three of the state/territory jurisdictions, so that the public are able to easily distinguish specialist from non specialist practitioners. This is especially important for those practitioners who have not met the criteria for specialist registration, but may be employed in positions called specialist, such as many "Area of Need" practitioners.

### ***Continuing competence requirements***

This section is not entirely clear and confuses Continuing Professional Development (CPD) programs with continuing competency. These are totally separate concepts, and ANZCA would strongly urge that it is CPD in which practitioners must participate. The assessment of continuing competence would

be very resource intensive, and could not be guaranteed to bring about the desired result. CPD is specialty specific, and must be administered by the Medical College which has been accredited for that (and other) purposes for that specialty.

It remains of concern that the new specialist categories/groups, specialist recognition processes and CPD arrangements will all have to be formally endorsed by Ministers. We are firmly of the view that Government should set legislation and that independent statutory bodies be responsible for its implementation which includes the setting of standards, so that government expediency does not over-ride good practice.

ANZCA remains committed to working with Government to ensure the new Scheme maintains the high standards of clinical practice and protects patient safety. We have had many years of co-operative experience with both the Australian and New Zealand jurisdictional medical registration authorities and look forward to continuing a similar relationship with the new Australian national medical registration authority.

Thank you for the opportunity to provide comments on this latest consultation paper on the proposed arrangements for specialists. As always, we welcome further ongoing consultation and would be happy to discuss any of the issues outlined in this submission.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Leona Wilson', written in a cursive style.

Dr Leona Wilson  
President