



# Medical Board of Queensland

ABN: 35 789 357 327

Our ref:

Your ref:

13 February 2009

Ms Bronwyn Nardi  
Chair  
Practitioner Regulation Subcommittee  
of the Health Workforce Principal Committee

**Arrangements for Specialists Submission**  
**Attention: Practitioner Regulation Subcommittee**

Dear Ms Nardi

The Medical Board of Queensland is pleased to have the opportunity to make a submission on the National Registration and Accreditation Scheme for the Health Professions consultation paper on Proposed Accreditation Arrangements.

After consideration of the consultation paper, it is advised the Board generally supports the proposed arrangements and additions to the registration arrangements as outlined in the initial consultation paper as they do not appear to be inconsistent to the current practise in Queensland.

The only issue of concern relates to the proposal that types of registration be mutually exclusive and that an individual would not hold more than one type of registration at any one time unless registered in more than one regulated profession. If this proposal includes that an individual may hold only one category of Limited Registration, difficulties will arise for those international medical graduates who currently practise in more than one category eg:

- specialist practise in one specialty and undertaking post-graduate training in a second specialty;
- undertaking teaching or research on a part-time basis together with clinical sessions in an area of need.

It is recommended the proposal that types of registration be mutually exclusive be dealt with as a matter of policy rather than through legislation to ensure unintended consequences do not occur.

Additionally, the definition relating to teaching or research should clearly indicate the requirement for registration only applies if the role requirements include clinical practice associated with the teaching or research.

Should you require clarification of any of the attached comments, please do not hesitate to contact myself on (07) 3405 6011 or Mrs Robyn Scholl, Manager, Policy Coordination and Review Services, on (07) 3225 2501.

Yours sincerely

Kaye Pulsford  
**Executive Officer**