



National Registration and Accreditation Scheme for the Health Professions

**Response from the Medical Practitioners Board of Victoria to the Further
Consultation Paper on:**

**PROPOSALS UNDER THE NATIONAL REGISTRATION AND ACCREDITATION SCHEME
FOR THE HEALTH PROFESSIONS IN RELATION TO SPECIALISTS**

13 February 2009

The Medical Practitioners Board of Victoria ('the Board') is a statutory authority established to protect the community and guide the medical profession.

The Board registers doctors, investigates complaints about doctors, monitors the health of doctors who are ill and may be unfit to practise medicine, and develops guidelines for the profession.

The Board is pleased to be offered an invitation to respond and offer comment on matters covered by the Health Workforce Principal Committee (Practitioner Regulation Subcommittee) further consultation paper on "Proposed arrangements for specialists within the National Registration and Accreditation Scheme for the Health Professions

Board members and the senior management staff of the Board have given careful consideration to the consultation paper and below are the Board's thoughts and responses to the consultation paper.

PROPOSALS UNDER THE NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR THE HEALTH PROFESSIONS IN RELATION TO SPECIALISTS

Registration arrangements consultation paper

Proposals 7.1 & 7.2

The Board supports the proposed amendment as outlined, for granting of general and provisional registration.

The Board makes the following comments and/or recommendations about the proposed 'limited registration' amendments:

- 'Specialist practice': the Board proposes that this be a category of **general registration** with an associated practice limitation;
- 'Post-graduate training': the Board supports the category but recommends the definition of the category should be expanded to also encompass medical practitioners undertaking teaching or research.
- 'Area of need': the Board supports the category but recommends that the responsibility and mechanism to designate a particular area as 'area of need' be clearly defined especially with respect to federal and state responsibilities. The Board strongly recommends that this category of registration needs to specifically state either that **'this is or is not a category of time limited registration'**. The legislation should not be silent on this critical issue. If it **is** proposed that it should be time limited the **period** of registration should be defined.
- 'Teaching or research': the Board believes with respect to Medical Registration, this is an obsolete category and **does not support** it as a separate category of registration for medical practitioners (refer comments under 'post-graduate training' category).
- 'Public interest': the Board supports the category but the term 'public interest' needs to be clearly defined so that the intent is clear.

The Board strongly supports the view that the categories of registration **not** be mutually exclusive given that there are cogent and practical reasons for medical practitioners to require registration in two separate categories simultaneously e.g. a medical practitioner with specialist registration undertaking supervised practice or study in order to gain general registration or an additional qualification that is outside their allowed scope of practice.

Proposal 9.2.1

The Board supports this proposal.

Proposal 9.2.2

The Board supports this proposal

Proposal 10.1.1

The intent and meaning of the proposed amendment of the term 'qualifications' to read 'qualifications standards' is unclear. The Board believes that the Practitioner Regulation Subcommittee of the Health Workforce Principal Committee provide stakeholders immediate clarification of the meaning of the proposed amendment with respect to the term 'qualifications standards' such that these additions and amendments can be analysed better.

Proposal 10.1.3

As was noted in the Board's original submission, the Board recommends amendment of 10.1.3 to reflect a more specific description than that proposed viz: 'specialist <specialty name>'.

Proposal 10.3.1

The Board supports this proposal with the observation that the phrase "... might reasonably have an interest..." could be open to interpretation as to which groups could influence the process. Additionally, the proposal should make it clear that any consultation must **not** inappropriately delay a recommendation to the Ministerial Council or a decision by the Ministerial Council.

Proposal 12.1

The Board supports the transitional arrangements as outlined in proposal 12.1.

Accreditation arrangements consultation paper

Proposal 3.4.3

The Board supports this proposal.