



**The Royal Australian  
and New Zealand  
College of  
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***Excellence in Women's Health***

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Practitioner Regulation Subcommittee  
Health Workforce Principal Committee  
Australian Health Ministers' Advisory Committee

By e-mail: [nraip@dhs.vic.gov.au](mailto:nraip@dhs.vic.gov.au)

Dear Subcommittee members

**Re: Further Consultation Paper – Proposed arrangements for specialists within the National  
Registration and Accreditation Scheme for the Health Professions**

Thank you for the opportunity to comment on the recently received Further Consultation Paper that was distributed to 'clarify the arrangements to apply to specialists in the regulated professions' under the National Registration and Accreditation Scheme.

As has been previously communicated, The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) is supportive of a scheme that seeks to simplify and clarify registration arrangements for medicine and other health professions, and that would enable such a development without any compromise in professional standards, patient safety and quality. The College does, however, feel that it would be remiss at this stage not to comment on certain specific aspects of the Further Consultation Paper with which it has concerns. These will be addressed in the order with which they are presented on pages 2 to 3 of the Further Consultation Paper.

**Specialist Endorsement**

The College is concerned that, despite clear views expressed by the profession at a consultation meeting held toward the end of 2008, the identification of a medical specialist continues to be via an endorsement on the general register, rather than on a separate specialist register. Such a specialist register would clearly identify to all stakeholders (particularly the public) that a medical practitioner whose name appears therein is a fully qualified specialist with qualifications that have been obtained through a recognised local body accredited by the Australian Medical Council, or who possesses specialist qualifications obtained overseas and who has been formally assessed as being partially- or substantially- comparable to an Australian trained specialist, and has subsequently completed all necessary requirements for full specialist recognition.

**Continuing Competence Requirements**

Despite apparently clear indications to the contrary at the consultation meeting held toward the end of 2008, the term 'Continuing Competence' is again used in the Further Consultation Paper for what is understood to be 'Continuing Professional Development'. The two are different, the use of the latter does not necessarily imply the former, and the message should not be sent, or implied, that they are interchangeable. Of particular interest is the proposed addition to 9.2.2 (Page 2, Point f; Attachment A - Page 7) where '... continuing competence standards for specialists in existence at 30 June 2010 will continue to apply with proposed changes to these standards (or new standards) to be developed by the board for approval by the Ministerial Council'. The College would implore clarification of the requirements to apply in regard to this matter under the proposed new scheme by a clear statement that indicates the intention of such requirements and replacement of the term 'Continuing Competence' with 'Continuing Professional Development'. Alternatively, should it be the case that, in fact, continuing competence arrangements are to be introduced for all health professions, a clear statement that this is the intention under the scheme should be made, along with some detail as to how and by whom this is intended to be assessed

### **Registration of specialists**

Under a National process conducted by the Colleges through the Australian Medical Council since 2002, 'Area of Need' in relation to medical specialties has had a specific meaning in regard to practitioners who are appointed to such positions. Generally, the process results in an overseas practitioner delivering a limited scope of specialist services under supervision (i.e. the practitioners in question are not recognised specialists). This is clearly meant to be understood by all concerned and any new proposed registration arrangements regarding practitioners under Area of Need arrangements should seek to strengthen this understanding, rather than potentially reduce it. As such, the College is concerned that any measure to enable medical practitioners other than those identified through the Australian Medical Council process to be registered as 'Area of Need' will result in possible safety risks through a potential misunderstanding and / or misuse of the system. Any Area of Need posting should also be time limited and should be reviewed at least every 3 years, to avoid potential abuse of the system.

The College would also seek clarification of the proposed application of registration under the 'Provisional registration' category and / or the various provisions of the 'Limited Registration' category in relation to specialists. Specifically, the College would implore any proposed arrangements to clearly indicate the manner in which medical practitioners working under any form of oversight following assessment of their qualifications as an overseas trained specialist through the process coordinated through the Australian Medical Council be clearly designated; i.e. under which category are medical practitioners assessed as 'partially comparable to an Australian trained specialist', and subject to further training and assessment requirements proposed to be registered, and under which category are medical practitioners undertaking a period of oversight before being designated as 'substantially comparable to an Australian trained specialist', and subject to further training and assessment requirements proposed to be registered? Such clarity would aid significantly the development of a process that enables efficient registration of such practitioners following assessment through the processes developed as a result of the COAG reforms and indicate clearly to all the circumstances under which the practitioners concerned are registered.

### **Scope of practice**

Should the arrangements as outlined proceed, the College is of the view that that a Board considering such an arrangement must (rather than 'should') consult with other relevant Boards.

### **Accreditation**

RANZCOG is not convinced that changes to the way specialist medical practitioners are accredited and re-accredited will lead to improved health care outcomes.

As indicated in the initial stages of this correspondence, RANZCOG is supportive of a national registration process that aids the development of a more efficient system, and where the key principles underlying the arrangements are maintenance of professional standards, patient safety and quality. The College looks forward to further development of such a system and is hopeful that the comments supplied herein contribute to that process.

Yours sincerely,



Dr Edward Weaver

**President**