

ROYAL AUSTRALASIAN COLLEGE OF SURGEONS

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Dr Joanne Katsoris
Executive Officer, Medical
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Dear Dr Katsoris

Consultation on proposed changes to the competent authority pathway and specialist pathway for international medical graduates

Thank you for the opportunity to comment on the proposals from the Medical Board of Australia (MBA) for changes to the processes supporting the assessment of International Medical Graduates (IMGs).

While there is some concern that the changes might add to the cost of assessment the College supports IMGs applying directly to the College for assessment. This will be an important step in streamlining the application process. Literature supporting the process must make clear to the IMG that they must still apply to the AMC for Primary Source Variation (PSV). College information will also make that clear.

The Royal Australasian College of Surgeons does not support the clinical assessment period for Substantially Comparable IMGs being restricted to 12 months of full time practice. There are occasions where a longer period of assessment is appropriate and the College would seek to retain the flexibility of a period of assessment up to 24 months. It should be noted that existing policy allows this but also has mechanisms for the period to be reduced on the recommendation of the supervisors.

There is major reservation regarding the new definition of Partially Comparable. The Australian public is best served by consultants who are qualified in the broad scope of one of the nine surgical specialties that the College trains in. This College has a policy (attached for your information) that does allow for a Fellowship with a defined scope when there is an obvious benefit to the public and the IMG meets Australian standards. This however is only applied to Substantially Comparable IMGs and is a recommendation following an assessment interview.

There is no support for assessing IMGs as partially comparable in a defined scope of practice. The Fellowship Examination, which is an important assessment tool in confirming that IMGs meet Australian standards, tests candidates in the full scope of practice. There is no capacity to examine in defined scopes. Consequently the College recommends that reference to defined scopes in the definition of partial comparability is removed. Further, IMGs should apply to a college for assessment without nominating a defined scope of practice.

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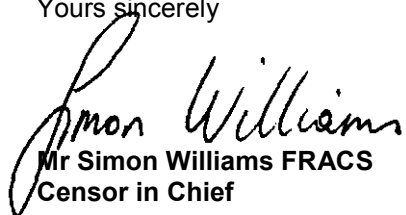
Your documentation refers to 12 and 24 months of supervision. It is this College's policy that should an IMG have an unsatisfactory period of assessment they undertake a remediation process to improve performance, rather than immediate termination of their pathway to Fellowship. We recommend that the maximum period is defined as "satisfactory" assessment.

With regard to up-skilling of IMGs documentation from the MBA and colleges should be more explicit that the IMG pathway to fellowship is not entry to a formal training program. It is acknowledged that partially comparable IMGs are required to gain additional skills while under assessment however they are acquired by self-managed education rather than through formal College education programs.

The College is committed in the assessment of IMG's comparability to an Australasian trained surgeon and looks forward to working with the AMC and the Medical Board to ensure successful strategies are identified and implemented.

Should you have any queries or comments please contact Mr Glenn Petrusch, Director, Education and Training Administration on [REDACTED] or by telephone on [REDACTED]

Yours sincerely



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