

Department of IMG Assessments

Email: [REDACTED]

14 February 2020

Dr Anne Tonkin  
Chair  
Medical Board of Australia

Via Email: [medicalboard@ahpra.gov.au](mailto:medicalboard@ahpra.gov.au)

Dear Dr Tonkin,

**Re: Good practice guidelines for the specialist international medical graduate assessment**

Thank you for the opportunity to provide formal feedback on the revised good practice guidelines for the specialist international medical graduate assessment process. RACS is broadly in agreement with the proposed changes however still has concerns in the following areas:

**1. Summary of preliminary findings**

RACS supports the proposal for a summary of findings as long as the summary accompanies, not precedes, the comparability assessment outcome.

The summary will need to be understood as to how it impacts upon the assessment of comparability. If a SIMG is broadly content with their assessment, there is little point in a prolonged discussion about details which do not affect the comparability outcome.

RACS has recently revised its policies to allow reconsideration, review and appeal of decisions. Revisions made are in line with Australian Medical Council requirements and allow for timely reconsideration of decisions by the original decision makers. Review can be undertaken by a new assessment panel. In our experience, this minimises the number of formal appeals. RACS does not believe that the proposed changes will offer a significant advantage to a SIMG.

RACS is also anxious not to extend the current timelines for processing SIMG assessments.

**2. Area of need assessments**

RACS does not support area of need only assessments. The nature of medical practice requires a broad range of attributes and skills and area of need positions often provide less than ideal support. This will require SIMGs to have greater, not lesser, or limited skills.

RACS also has concerns regarding SIMGs whose intentions are to work in Australia for a short period of time. RACS believes that many of such SIMGs will ultimately wish to stay in Australia long term. RACS already processes a significant number of comparability assessments from SIMGs who have worked in Australia on a short-term training pathway.

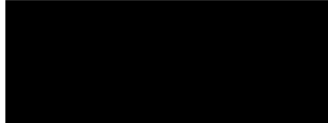
RACS notes that the area of need process has been applied inconsistently with a lack of agreed criteria for its application.

RACS does not agree that a SIMG should be able to work in an area of need without progressing towards specialist recognition in Australia. Should a SIMG remain in such a position there is no way that RACS can ensure appropriate supervision and support. This will lead to two standards of specialist medical practice and will not be acceptable to the community.

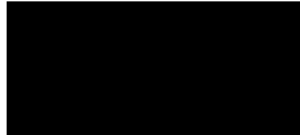
Thank you again for seeking our feedback. RACS supports these comments being published.

We look forward to the new standards, hopefully with appropriate changes and implementation.

Yours sincerely,



Associate Professor Kerin Fielding  
Chair, IMG Committee



Mr Graeme Campbell  
Clinical Director, IMG Assessment and Support

cc:

