



THE AUSTRALASIAN COLLEGE OF DERMATOLOGISTS

PO Box 3785, Rhodes NSW 2138 Australia

Suite 2A, Level 2, 9 Blaxland Road, Rhodes NSW 2138 Australia

Telephone: +61 2 8765 0242 | Australia Only: 1300 361 821

Facsimile: +61 2 9736 2194 | Email: admin@dermcoll.edu.au

Website: www.dermcoll.edu.au

14 February 2020

Dr Anne Tonkin
Chair, Medical Board of Australia

By email: performanceframework@ahpra.gov.au

Dear Dr Tonkin

ACD response to consultation on revised CPD Registration Standard

Thank you for the information and documents regarding the Draft revised Registration standard: Continuing professional development. College has reviewed the updated standard and comments on each question are provided below. The College supports Option 2 for a revised standard. It agrees with the sentiment of the document and believes CPD homes provide an opportunity for organisations to further develop CPD programs to meet the needs of members and other individuals who wish to learn from a suitable provider.

Part A of the review

1. Is the content and structure of the draft revised CPD registration standard helpful, clear, relevant and more workable than the current standard?

College believes that the draft is clearly articulated. No further comment.

2. Is there any content that needs to be changed or deleted in the draft revised standard?

College believes that the draft is clearly articulated. College notes that the allocation of hours remain as previously indicated and that this may limit an individual's decision to focus on a particular area of CPD. Could the Board make it clear that there is or is not flexibility in the split of hours at the College's or individual's discretion.

3. Is there anything missing that needs to be added to the draft revised standard?

No further comment.

4. Do you have any other comments on the draft revised CPD registration standard?

College maintains its earlier position in relation to monitoring external CPD homes. Clear standards for CPD home requirements will be necessary.

How does the Board intend to manage Post Training Candidates who have completed training but are no longer in the training program? In some cases these trainees will not be in a training position and as such would need to be monitored to ensure they meet CPD requirements.

Part B of the review

5. Who does the proposed registration standard apply to?

- a. **Should the CPD Registration standard apply to all practitioners except the following groups?**
- b. **Are there any other groups that should be exempt from the registration standard?**

College is satisfied with the proposed standard and has no further comment on part A or B of this question.

6. Interns

- a. **Do you agree that interns should be exempted from undertaking CPD or should they be required to complete and record CPD activities in addition to or as part of their training program?**
- b. **If CPD is included as a component of their training program/s, should interns have to comply with the same mix of CPD as other medical practitioners?**
- c. **Should interns have to record what CPD they are doing or is completion of the program requirements sufficient to comply with the standard?**

As previously stated, College does not have a specific view on this question, however developing life-long CPD learning patterns and behaviours are an essential part of professional development

7. Specialist trainees

- a. **Do you agree specialist trainees should be required to complete CPD as part of their training program?**
- b. **If CPD is included as a component of their training program, should specialist trainees have to comply with the same mix of CPD as other medical practitioners?**
- c. **Should specialist trainees have to record what CPD they are doing or is completion of the program requirements sufficient to comply with the standard?**

College agrees with the recommended structure proposed in the revised documents. College's only concern is for those trainees who fail to complete their training and become Post Training Candidates, and as such may no longer be in a training position. How will this group be managed?

8. International medical graduates

- a. **Should IMGs be required to complete CPD in addition to or as part of their training program or supervised practice?**
- b. **If CPD is included as a component of their training program or supervised practice, should IMGs have to comply with the same mix of CPD as other medical practitioners?**

- c. Should IMGs have to record what CPD they are doing or is completion of the program requirements or supervised practice plan sufficient to comply with the standard?**

College agrees with the recommended structure proposed in the revised documents. It notes that until IMGs are in a training program position, they should be required to meet CPD requirements as other medical practitioners.

9. Exemptions

- a. Should exemptions be granted in relation to absence from practice of less than 12 months for parental leave, in addition to serious illness, bereavement or exceptional circumstances?**
- b. Is 12 months an appropriate threshold?**
- c. Should CPD homes grant these exemptions or should the Board?**

College agrees with the recommended structure proposed in the revised documents.

10. Practitioners with more than one scope of practice or more than one specialty

- a. Do you agree with the Board's proposal that medical practitioners with more than one scope of practice or specialty are required to complete CPD for each of their scopes of practice/specialty and where possible this should occur within one CPD home? Do you have alternative suggestions?**

College agrees with the recommended structure and broad scope proposed in the revised documents.

11. CPD required

- a. Are the types and amounts of CPD requirements clear and relevant?**
- b. Should all practitioners, including those in roles that do not include direct patient contact, be required to undertake activities focussed on measuring outcomes as well as activities focussed on reviewing performance and educational activities?**
- c. If practitioners in roles that do not include direct patient contact are exempted from doing some of the types of CPD, how would the Board and/or CPD homes identify which roles/scopes of practice should be exempt and which activities they would be exempt from?**

College agrees with the recommended structure and broad scope proposed in the revised documents.

12. CPD homes

- a. Is the requirement for all practitioners to participate in the CPD program of an accredited CPD home clear and workable?**
- b. Are the principles for CPD homes helpful, clear, relevant and workable?**
- c. Should the reporting of compliance be made by CPD homes on an annual basis or on another frequency?**

- d. Is six months after the year's end feasible for CPD homes to provide a report to the Board on the compliance of participants with their CPD program(s)?**
- e. Should the required minimum number of audits CPD homes must conduct each year be set at five percent or some other percentage?**
- f. What would be the appropriate action for CPD homes to take if participants failed to meet their program requirements?**

College has no further comment on these questions following a review of the revised standards. It believes each College should set their reporting cycle and ACD is comfortable with the current 2 year cycle. College believes that 6 months is a suitable timeframe by which to report on and that 5% is an appropriate target for an audit. College believes reporting to the College Board would be the best action for remediation and action, determined by the College. Should this fail, then the Fellow should be reported to the MBA.

13. High level requirements for CPD programs

- a. Should the high-level requirements for CPD in each scope of practice be set by the relevant specialist colleges?**

Yes. The College believes that each Specialist College should be responsible for setting these requirements. It does not believe that a 12 month annual requirement is suitable or workable. Colleges should be given the ability to set the requirements.

Part C of the review

14. Transition arrangements. What is a reasonable period to enable transition to the new arrangements?

For those without a CPD home, or who are not doing their CPD through a College, the transition period should be 2 years. For those using an existing College CPD home, the status quo should prevail. There should also be a level of consideration given to the development of CPD homes and the time taken to set up and manage new members. In this case there could be exceptions and longer periods granted as CPD homes are being developed.

Should you wish to discuss these matters with College, please feel free to contact Mr Brett O'Neill, Director Education Services at the College on 02 87414199 or brett@dermcoll.edu.au.

Kind regards



Dr David Francis
President