



australian diagnostic imaging association

## **ADIA SUBMISSION ON THE MBA DRAFT REVISED GOOD PRACTICE GUIDELINES FOR THE SPECIALIST INTERNATIONAL MEDICAL GRADUATE ASSESSMENT PROCESS**

February 2020

The Australian Diagnostic Imaging Association (ADIA) is appreciative of the opportunity to provide comment on the Medical Board of Australia's (MBA) *Draft revised Good practice guidelines for the specialist international medical graduate assessment process*.

ADIA represents radiology practices throughout Australia, both in the community and in hospitals. It promotes the ongoing development of policy, standards and appropriate funding to ensure that all Australians have affordable access to quality radiology services. This supports radiology's central role in the diagnosis, treatment and management of a broad range of conditions in every branch of medicine. Over 1200 radiologists and nuclear medicine specialists practice with ADIA member clinics.

ADIA considers the draft revisions to be an improvement on the current good practice guidelines for the specialist international medical graduate assessment process. By reframing the guidelines as 'standards' and amending the comparability definitions for IMGs, specialist colleges will have clearer guidance on the appropriate assessment of IMG comparability.

If you have any questions relating to this submission, please contact [REDACTED]

In this submission, ADIA has responded to each of the 'Questions for Consideration' featured in the MBA's consultation paper.

### **1. Are the proposed Standards, clearer and easier to read? In particular, are there any areas of the proposed Standards that could be clearer about the precise requirements of the assessment processes?**

Yes, ADIA considers that the proposed standards are clearer and easier to read than the current guidelines. The new standards provide stronger guidance to specialist colleges on the assessment processes and criteria, to ensure SIMGs are assessed appropriately and equitably across specialisations.

### **2. Does the rewording and restructure of the comparability definitions make the distinction between substantially comparable, partially comparable and not comparable SIMGs clearer or are they open to interpretation? If they are not clear, how should the definitions be reworded or what additional explanation should be included in the proposed Standards?**

Yes, the rewording of the comparability definitions provides clearer guidance to specialist colleges on the assessment of comparability for SIMGs.

It is important for an SIMGs assessment of comparability to not be weighted too heavily on the differences between the Australian training program and that of the SIMG's qualification. SIMGs are often employed by Australian employers to practice their specialty within a limited scope of practice. In radiology, these specialists may be employed to provide general radiology services in areas of need or conversely, to provide services that fall within their sub-specialty.

Each SIMG should be assessed on their professional experiences, qualifications and their intended scope of practice. To this effect, ADIA believes the MBA's proposal for the assessment of the SIMG comparability clearly and adequately makes this distinction.

**3. For the definition of substantially comparable, do you support replacing the term 'peer review' with the term 'supervised practice'? If not, please give reasons.**

Yes, ADIA agrees with the proposal to replace the term 'peer review' with 'supervised practice.' However, it is vital that those SIMGs who have been employed to work within an area of need can be supervised remotely where necessary.

Highly trained radiologist SIMGs are regularly employed to fill a workforce shortage in areas recognised by the Government as an area of need. This is due to the difficulty in acquiring an Australian-trained specialist to fill vacancies outside inner metropolitan areas. Because of the shortage of trained specialists available in these regions, there will also be a shortage of specialists capable of supervising the SIMGs.

Remote supervision should be permitted where it is appropriate for the services being provided by the SIMG. For example, unlike specialists with frequent patient contact and consultation, radiologists report examinations after images have been acquired. Multi-site radiology providers have enterprise networked RIS/PACS systems, which allow for remote reporting and supervision.

For this reason, remote supervision of SIMGs should be acceptable, particularly for those SIMGs working in areas of need.

**4. Do you support a mandatory minimum period of supervised practice for all SIMGs assessed as substantially and partially comparable? If not, please give reasons. If yes, are the minimum periods proposed appropriate?**

ADIA considers the inclusion of a mandatory minimum period of supervised practice for both substantially and partially comparable SIMGs of three and six months respectively to be appropriate.

**5. Do you support the proposal for a Summary of preliminary findings as part of the comparability assessment process? If not, please give reasons.**

ADIA considers the introduction for a Summary of preliminary findings to be an appropriate addition to the proposed standards.

In line with the other components of the draft revision, the requirement for a Summary of preliminary findings will facilitate a more transparent assessment process for SIMG applicants within the same specialisation. It will also enable the SIMG to review the colleges assessment to ensure all areas of their application have been appropriately considered and assessed.

**6. Is the timeframe for providing a SIMG with a Summary of preliminary findings and the timeframe for receiving feedback from the SIMG appropriate? If not, what should the timeframes be?**

Yes, the proposed timeframe for providing a SIMG with a summary of preliminary findings is appropriate.

**7. Is the level of information to be included in the Summary of preliminary findings appropriate? Is there any additional information that should be included?**

Yes, ADIA believes the information to be included in the proposed Summary of preliminary findings is appropriate. However, ADIA recommends including information on two additional components:

1. The SIMG's Intended Scope of Practice

The purpose of the Summary of preliminary findings is to indicate the college's initial assessment of the SIMG's suitability for their intended role. Without indicating the SIMG's intended scope of practice within the Summary of preliminary findings, there would be grounds to only assess the SIMG on the criteria set out within the MBA's standards. This may lead to prospective SIMGs being assessed for a position that is outside their intended scope of practice.

2. Individuals Included in the Assessment

The Summary of preliminary findings should include a list of those individuals who conducted and approved the summary of preliminary findings.

**8. Is the proposal for when it is appropriate to conduct an area of need assessment only, helpful and appropriate? If not, please give reasons.**

Yes, the proposal for when it is appropriate to conduct an area of need assessment only is helpful and appropriate.

**9. Is the proposal for colleges to publish a minimum list of requirements for eligibility to apply for assessment (specialist recognition and area of need) appropriate? Are there any other minimum requirements that should be included?**

Yes, the proposal for colleges to publish a minimum list of requirements for eligibility to apply for assessment is appropriate. Publication of these lists would provide applicants and employers with a greater understanding of the requirements.

**10. Is the revised guidance on assessing SIMGs for a limited scope of practice clearer? If not, which aspects are unclear and what additional information should be included?**

Yes, the revised guidance on assessing SIMGs for a limited scope of practice is clearer.

**11. Is there anything missing that needs to be added to the proposed standards?**

ADIA recommends that the guidelines require specialist colleges to demonstrate the mechanisms they employ to avoid conflicts of interest or perceptions of bias in assessments of comparability to an Australian-trained specialist or suitability for an area of need position; and determination of additional requirements to be completed.

**12. Do you have any other comments on the proposed standards?**

ADIA does not have any other comments on the proposed standards.