

Consultation on proposed Standards for the SIMG assessment process.

I provide the following comments in response to the Board's invitation for feedback on the proposed Standards based on my current experience as an applicant for SIMG Assessment. In the interests of transparency I am comfortable for the submission to be published but request that it is done so on the basis that all personal identifying information is removed.

Questions for consideration

- 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 process?**

The proposed standards are a significant improvement on the current Guidelines.

- 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?**

While the rewording of the comparability definitions make the distinction between substantially comparable, partially comparable and not comparable SIMGs clearer consideration could be given to providing further clarity based upon the level of supervision required.

Page 5 of the Consultation Paper makes reference to level of supervision ranges for IMGs. Consideration should be given as to whether the supervision levels for IMGs are equally applicable to SIMGs and whether a partially or substantially comparable SIMG may be distinguished based on the level of supervision required.

- 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.**

I support the change in terminology.

- 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?**

While there are a number of limited circumstances in which a supervision of a substantially comparable SIMG will be of limited benefit to the SIMG, in the overall interest of public health and safety I believe the proposed minimum periods of supervision are 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.

I strongly support the transparency this initiative will bring to the SIMG assessment process.

I believe the propose process will assist in ensuring both objectivity and rigor during the assessment process. Furthermore, a detailed explanation may assist in reducing the incidence of requests for reconsideration.

6. Is the time frame 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 time frames be?

I believe the time frame in which a college is to provide the Summary of preliminary findings is appropriate although there is a lack of clarity and certainty with regard to the enforcement of such standard or consequences for failing to abide by the standard.

In the absence of the ability to ensure that a college abides by the proposed time frame, the SIMG is largely at the mercy of a college with regard to the time frame in which the Summary of preliminary findings will be delivered. Given the SIMG is in a position of having to respond to the college, I believe a period of 28 days in which the SIMG has to respond to the Summary of preliminary findings is more reasonable and is not prejudicial to the colleges. This provides the SIMG with the opportunity to respond earlier if necessary and additional time to gather additional supporting material if required.

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

Given the proposal that both substantially comparable and partially comparable SIMG's will require supervision, up to 24 months in the case of a partially comparable SIMG, specification of those areas of practice giving rise to the need for supervision should be identified and may assist supervisors and applicants during the supervised period.

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

No Comment.

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?**

I support the proposal for colleges to publish a minimum list of requirements for eligibility to apply for assessment (specialist recognition and area of need).

I make no comment as to the minimum requirements.

10. Is there any thing missing that needs to be addressed in the propose Standards

Conflict of Interest

Section 5.2 of the proposed Standards provides:

“implement a documented governance framework for the operation of the committee which will include

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- *Procedures for declaring and managing conflicts of interest. For example, individuals involved in the direct supervision/workplace assessment/employment of a SIMG must not be involved in the decision on whether to recommend the SIMG be granted recognition as a specialist.*

To maintain the integrity of the SIMG assessment process consideration should be given to referencing the need to avoid perceived as well as actual conflicts of interest.

While the examples of conflict of interest cited are valid, consideration should be given to encouraging those involved in the decision making process to consider whether a real or perceived conflict of interest might arise in circumstances where the candidate will potentially be a professional rival/competitor. [REDACTED]

[REDACTED]

Ensuring the SIMG Assessment Committee has all available relevant information before them at the time of interview.

Section 6.8 of the proposed Standard provides

“Establish a process to monitor applications for assessment to ensure they progress in a timely manner”

While it is important to ensure that applications progress in a timely manner, it is equally important that there are procedures in place to ensure that in circumstances where applications do not proceed in a timely manner, the most up to date information is available at the time of assessment.

My circumstances are such that the first available assessment was more than [REDACTED] after my initial application yet no process was in place to ensure that details of my training and experience during the interim period was available to the assessment panel.

Consideration should be given to including guidance with respect to the need to consider whether refreshing the application is warranted in circumstances where the benchmark time frames are not met.

Independent Oversight for excessive benchmark failures.

I note that the MBA Benchmark between application and time to first available interview is 3 months. Consideration should be given to a requirement whereby exceeding a benchmark time frame by a defined amount or percentage automatically triggers an independent review of the cause giving rise to the failure. In my circumstances, I have sought clarification of the reasons for the delay however my requests for clarification have thus far been ignored.

Transparency of Assessment Decision

While it is hoped that the requirement to provide SIMGs with the Summary of Preliminary to which the SIMG may respond, consideration should be given with regard to providing guidance in relation to the provisioning of reasoning in relation to the final decision. This would ensure transparency and clarification in relation to the manner in which subsequent information was considered as well as clarifying the basis for the ultimate decision.

I envisage that the final communication and reasons for the decision could be in a format similar or exactly the same as the Summary of Preliminary Findings.

This would enable an SIMG to move more quickly to seeking reconsideration where appropriate, rather than facing additional delay while reasons for the decisions are sought.

Further guidance or standards are required in relation to the transparency of the reasons for the SIMG assessment outcome.

Reasons such as those currently provided by the Colleges an extract of which is provided in italics and do no more than state [REDACTED]
[REDACTED]
[REDACTED] are woefully inadequate.

Further Benchmarking of Time Frames

- (a) In circumstances where the standards do not require reasons to be provided with the notification of the assessment outcome, consideration should be given to bench marking a time frame from the point at which a request for reasons are made and the time frame in which reasons are provided.

In my circumstances, the college took over [REDACTED] to provide the reasons for the determination.

- (b) Given that SIMG's assessed as partially or substantially comparable will be required to undertake further supervision. In circumstances [REDACTED]
[REDACTED] consideration should be given to establishing benchmarks in relation to the approval of a request [REDACTED]

Having waited more than [REDACTED] since the date of my SIMG application for an assessment interview and received the outcome of my SIMG application more than [REDACTED] months after my SIMG application, approximately [REDACTED] weeks have transpired without a response [REDACTED]
[REDACTED]

Enforcement

Despite performance benchmarks established by the MBA which provide the basis against which to ascertain whether an SIMG application is progressing in a timely manner, compliance with the process is largely self regulated.

Consistent with the Principles of the assessment process that "*fees charged will be reasonable, having regard to the efficient and effective operation of the assessment process*" consideration should be given to providing guidance regarding the refunding of fees or a proportion of them in circumstances where actual performance time frames grossly exceed the benchmark performance timeframes.