

25 February 2020

Dr Anne Tonkin,
Chair, Medical Board of Australia
Email medicalboard@ahpra.gov.au

Dear Dr Tonkin,

I write to provide the Royal Australian College of General Practitioners (RACGP)'s feedback on the public [draft revised Good practice guidelines for the specialist international medical graduate assessment process](#).

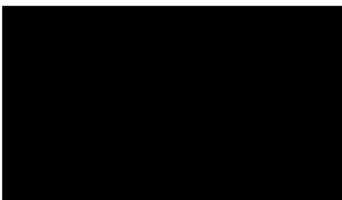
The RACGP welcomes the reframing of the guidelines as Standards, and appreciates the additional clarity this provides to both Specialist International Medical Graduates (SIMGs) and the medical colleges. The change from 'peer review' to 'supervision' to substantially comparable SIMGs and the proposed minimum periods of supervised practice align well with the RACGP's continued implementation of the Practice Experience Program Specialist stream (PEP-SP). The PEP-SP allows the RACGP to support both partially and substantially comparable SIMGs with educational support and formative assessment before the award of Fellowship. These changes allow SIMGs to access both educational support and provider numbers in areas of workforce need before receiving a Fellowship, delivering services to Australians where they are needed most.

The RACGP supports the proposal that SIMGs who are assessed for comparability are provided with a *Summary of preliminary findings*. The RACGP expects that such a *Summary* will reduce the number of unexpected outcomes, minimise appeals, and improve the experience for SIMGs. The RACGP would expect that all relevant information should be provided in the initial application, and that opportunities for SIMGs to provide additional information after the *Summary* may be subject to reasonable limits.

The RACGP seeks clarification on the status of an SIMG who has completed the maximum of 12 months' (substantially comparable) or 24 months' (partially comparable) full-time equivalent practice, but has not yet exhausted the maximum timeframe (two years and four years, respectively). Is it the Board's intention that the medical college should submit Report 2 confirming the SIMG has not met the college requirements after the 12 or 24 months' FTE work, or only after the two or four years' maximum timeframe?

The RACGP looks forward to receiving further information on the progression of the proposed Standards, including updates on changes in response to consultation and a timeline for implementation.

Yours sincerely



Dr Harry Nespolon
President