

30 April 2009

Elton Humphery  
Committee Secretary  
Senate Community Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Mr Humphery

**Inquiry into the National Registration and Accreditation Scheme for Doctors and other Health Workers**

The Royal Australasian College of Medical Administrators (RACMA) is an AMC accredited medical specialist college dedicated to the education, training and professional development of medical practitioners in senior leadership, management and administrative roles, across a wide range of clinical and non-clinical settings,<sup>1</sup> throughout the Asia Pacific Region.

Its mission is to promote development of the specialty and cultivate medical practitioners' capacity to skilfully manage dynamic and diverse health sector organizations to meet the health care needs of the community.

The College supports the concept of national registration for medical practitioners which would establish nationally consistent registration: categories; requirements; processes; and professional standards against which professional conduct and ongoing competence can be assessed, thus allowing for seamless movement of the medical workforce across jurisdictional boundaries.

To ensure that only medical practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered, the new national medical board and its jurisdictional subsidiaries, must include an adequate number of medical practitioners and continue working with the AMC and the medical colleges when evaluating Australian and overseas trained medical practitioners for registration purposes.

Further, to improve transparency and accountability, the public register must clearly distinguish: medical students; pre-vocational and vocational trainees; medical generalists; medical specialists; Australian and international medical graduates, highlighting any conditions which may apply.

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<sup>1</sup> Regional health services, hospitals, educational institutions, research facilities, management consulting firms, government departments, defense organizations, legal firms, other.

In relation to the establishment of a combined national registration and accreditation scheme, while it is certainly appropriate to align education and training standards with registration requirements for each individual health profession, it is not appropriate to have a single government agency control:

- health practitioner registration;
- development of accreditation standards;
- assessment of education and training programs against those standards; and
- accreditation education and training programs accordingly.

It is understood that this concept was originally proposed to facilitate workforce reform by redefining and linking training program accreditation standards to health professionals' registration requirements. If implemented by a single agency this automatically creates the risk of compromising the quality and safety of education and training programs to meet questionable workforce reform objectives or any other political imperatives.

Health practitioner registration and education and training program accreditation should remain the responsibility of two separate entities which have the power to independently carry out their assigned roles and responsibilities, without political or any other interest groups influence.

The AMC has proven to be highly efficient and effective in accrediting medical education and training programs since its establishment in 2002, earning the confidence and respect of the medical profession and the Australian and international community.

The College supports the view of the other medical colleges that the legislative framework underpinning the new scheme should formally recognise the medical colleges' role in:

- accreditation and standard setting;
- determining specialist qualifications held by medical practitioners;
- managing continuing professional development programs for the medical profession;
- assessing international medical graduates applying for recognition to practice in Australia.

Overall the College supports continuous improvement of the systems and standards for medical practitioner registration and education and training program accreditation however, the current composite model is not supported. Any changes to existing accreditation systems should be deferred until after the national registration scheme has been established and is functioning effectively.

I hope this information assists you in your Inquiry.

Yours sincerely



Dr Karen Owen  
**Chief Executive**