

# Short-term Training in a Medical Specialty Policy

| Author(s):   | Manager, OTP Assessment & CPD Operations   |  |
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| Department:  | Professional Practice  |  |
| Policy Owner:                                      | Overseas Trained Physicians (OTP) Committee  |  |
| Approved By:                                       | College Education Committee  |  |
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| Next Review Date:                                  | 1 June 2025  |  |
| Relevant legislation/codes/<br>RACP Constitution   |  |  |
| Related by-laws/policies/<br>procedures/guidelines | Medical Board of Australia Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration  Medical Board of Australia Supervised practice for international medical graduate guidelines |  |
| Applicability                                      | Australia  |  |

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#### 1. INTRODUCTION

- 1.1. Under the Health Practitioner Regulation National Law Act 2009, the Medical Board of Australia (MBA) is responsible for granting medical registration in Australia. Specialist medical colleges have an important role in providing advice to the MBA on International Medical Graduate's (IMGs) applications for short-term training.
- 1.2. The Royal Australasian College of Physicians (RACP) is the relevant specialist medical college for IMGs applying for registration to practice in the specialities of addiction medicine, adult medicine, occupational and environmental medicine, palliative medicine, paediatrics and child health medicine, public health medicine, nuclear medicine, and sexual health medicine.
- 1.3. The RACP follows the 'guidelines for short-term training in a medical specialty for international medicals graduates who are not qualified for general or specialist registration' published by the MBA.
- 1.4. Short-term Training in a Medical Specialty (STTMS) is defined by the MBA as a pathway that allows IMGs who are qualified specialists or specialists-in-training to undertake a short period (up to 24 months) of training in a particular medical specialty area in Australia.

#### 2. PURPOSE AND SCOPE

- 2.1. This policy states the role of the RACP in the assessment of IMGs undertaking STTMS in Australia and specifies the purpose of the STTMS pathway, the eligibility criteria, the requirements for IMGs seeking RACP approval and the time limits for practising on the pathway.
- 2.2. The RACP is responsible for providing support for the IMG for the purposes of registration with the Australian Health Practitioner Regulation Agency (AHPRA), only. RACP is not responsible for determining who will be employed in a STTMS position; this is a decision of the employing body.
- 2.3. The STTMS pathway is not accredited by the RACP for the purposes of specialist training in Australia and does not lead to Fellowship of the College or specialist recognition in Australia. This is because the STTMS pathway is intended to provide increased training and education to assist IMGs in developing their specialist skills for use in their country of specialist training. The pathway also promotes opportunities for exchange fellowships.
- 2.4. Support provided for this pathway does not relate to eligibility to join an RACP training program. The issuing of a certificate of satisfactory completion for a period of practice on this pathway is the responsibility of the employer, not the RACP. This is because the training is not accredited by the RACP as stated above.

#### 3. WHO DOES THIS POLICY APPLY TO?

- 3.1. In line with the MBA's Guidelines for short-term training, this policy applies to IMGs who apply for limited registration for postgraduate training or supervised practice under the STTMS with the RACP, who are:
  - 3.1.1. recognised as qualified specialists in another country of training (outside Australia) or,
  - 3.1.2. specialists-in-training in another country (outside Australia) and who: a) are likely to be no more than two years away from completing their specialist training; and b) have passed a basic specialist examination or have satisfactorily completed substantial training (generally three or more years, i.e. PGY 5).

#### 4. WHAT MATTERS ARE COVERED BY THIS POLICY?

- 4.1. The intent of this policy is to cover the following matters:
  - 4.1.1. the maximum timeframe permitted on this pathway
  - 4.1.2. the responsibilities of the RACP and the IMGs under this pathway
  - 4.1.3. the requirements for determining the eligibility for the applicant to apply for the pathway, the training position is genuine training, and the supervision is appropriate for the training provided
  - 4.1.4. ensure the employing sites has the capacity to provide genuine training
  - 4.1.5. the application and assessment process, including extensions, timeframes for assessment, relevant fees, and the monitoring and evaluation measures of STTMS.

#### 5. ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

#### 5.1. Maximum timeframe permitted for IMGs to practice on the STTMS pathway

- 5.1.1. The MBA stipulate that the maximum period of practice permitted on this pathway is up to 24 months.
- 5.1.2. This pathway is appropriate for IMGs who intend to complete a period of short-term training in Australia, up to 24 months, and return to their country of practice following this period of training.
- 5.1.3. IMGs who intend to practise in Australia for more than 24 months need to meet the requirements for the competent authority pathway, standard pathway (AMC certificate) or specialist pathway (either specialist recognition or area of need).

#### 5.2. RACP responsibility

- 5.2.1. The role of the RACP is to assess whether:
  - 5.2.1.1. The IMG is a genuine specialist-in-training or internationally qualified specialist; and
  - 5.2.1.2. The position that the IMG has applied for is a genuine training position that is appropriate for that IMG's training requirements, taking into consideration their reported level of training and experience; and
  - 5.2.1.3. There is adequate supervision and support for the IMG's level of training and experience taking into consideration the purpose and principles of supervision as set out in the Board's guidelines for the supervision of IMGs.
- 5.2.2. The RACP provides a recommendation to the MBA for the purposes of limited registration only. The assessment of an IMGs suitability to practice on the STTMS pathway is the responsibility of the Overseas Trained Physicians (OTP) Committee. From time to time, specialty advice may be sought from the relevant Advanced Training Committee OTP Co-opted Member.
- 5.2.3. The RACP is not responsible for and cannot assist IMGs with:
  - 5.2.3.1. finding employment
  - 5.2.3.2. immigration or visa requirements

| 5.2.3.3. | medical registration matters including assessing the competence of the IMG applying for registration or deciding whether to register the individual |
|----------|---|
| 5.2.3.4. | Medicare provider status  |
| 5.2.3.5. | primary source verification of overseas qualifications  |
| 5.2.3.6. | providing a confirmation certificate/letter of completed training   |
| 5.2.3.7. | an assessment of the IMGs training and experience for   |
|          | comparability against the training and experience of an   |
|          | Australian trained specialist in the same field of practice.  |

# 5.3. Determining whether the application is a genuine specialist-in-training or internationally qualified specialist

- 5.3.1. IMGs who are internationally qualified specialists must apply to the Australian Medical Council (AMC) for primary source verification of their primary and specialist qualifications.
- 5.3.2. IMGs who are international specialists-in-training must apply to the AMC for primary source verification of their primary qualification and provide a letter from the overseas College or State Medical council. This letter must be submitted on official letterhead and confirm the IMG is enrolled in a training program and is no more than two years from completion of specialist training.
- 5.3.3. The IMGs qualifications must be either outsourced or verified within their AMC portal before the RACP will begin to review the application.

# 5.4. Determining if the role is a genuine training position that is appropriate for the applicant's level of training and experience

- 5.4.1. The training position constitutes a genuine training position which, in compliance with the MBA Guidelines, means that this is a training position accredited by the RACP or is a formal structured training position that consists of formal assessment processes and mechanisms for measuring learning outcomes.
- 5.4.2. A genuine training program must be specific to the IMGs training requirements and must provide detailed information on the clinical, teaching and research activities included as well as the formal assessments that the supervisors will undertake to monitor the IMGs progress. These activities must be outlined in the weekly timetable.
- 5.4.3. Where the IMG is applying for STTMS at a site that is not accredited by the RACP for advanced training in the specific subspecialty, the RACP will carefully assess the sites capacity to deliver genuine training to the IMG
- 5.4.4. The RACP will also consider the extent to which the STTMS position will provide the IMG with experience not normally available in their country of training.
- 5.4.5. The RACP will not support STTMS applications that are service roles with the purpose of filling workforce shortages.
- 5.4.6. The training position must not disadvantage any trainee in the RACP training program. The training position must be supported and signed by the employer and the nominated supervisors.

# 5.5. Determining if there is adequate supervision and support for the applicant's level of training and experience

- 5.5.1. All IMGs must have two onsite supervisors that meet the requirements outlined in this section of the policy.
- 5.5.2. IMGs must have two onsite supervisors, who hold Fellowship of the RACP, per training site. Visiting Medical Officers, locum doctors or supervisors who visit the site infrequently will not be considered.
- 5.5.3. In accordance with the MBA Guidelines for Supervised Practice for International Medical Graduates:
  - 5.5.3.1. Supervisors must hold specialist registration in the same speciality as the training position proposed by the IMG.
  - 5.5.3.2. The RACP does not support supervisors having direct supervisory responsibility for more than four IMGs.
  - 5.5.3.3. Supervisors can have up to one IMG on level 1 supervision and up to three IMGs on other levels (i.e. level 2 supervision).
- 5.5.4. When considering whether adequate supervision is in place, the RACP will carefully assess the sites capacity to provide genuine training to the IMG to meet their individual training needs and expects a local curriculum with learning outcomes.
- 5.5.5. Detailed information on the supervision arrangements, the level of supervision proposed in the AHPRA application for registration (i.e. level 1 or 2 supervision) and schedule of supervision for the IMG must be provided within the RACP training program.
- 5.5.6. As level 4 supervision is considered remote supervision, the RACP does not support this type of supervision for IMGs on the STTMS pathway.

#### 5.6. Responsibilities of the IMGs

- 5.6.1. IMGs must provide evidence that they:
  - 5.6.1.1. Are recognised as a specialist in another country of training (outside Australia), or
  - 5.6.1.2. Are specialists-in-training in another country (outside Australia) and are no more than two years away from completing their specialist training and have passed a basic specialist examination or have satisfactorily completed substantial training (generally three or more years i.e. PGY5).

#### 5.6.2. IMGs must:

- 5.6.2.1. Familiarise themselves with the relevant Australian regulations, guidelines, and registration standards, along with the RACP policy on STTMS.
- 5.6.2.2. Independently secure a training position with appropriate supervision arrangements.
- 5.6.2.3. Seek prospective approval of STTMS by the RACP.
- 5.6.2.4. Have regular meetings with their supervisors, engage fully with the training and respond constructively to feedback and areas for development.
- 5.6.2.5. Follow the instructions and requirements received from RACP.

- 5.6.2.6. Communicate to the RACP any change in circumstances that has an impact on their application or supported period of practice.
- 5.6.2.7. Be aware of the maximum 24-month timeframe permitted on this pathway.
- 5.6.2.8. Be aware of the requirement to complete genuine training. IMGs on the STTMS pathway are not permitted to fill service roles.
- 5.6.2.9. Understand the RACP is unable to expedite applications based on commencement date, AHPRA registration or visa expiry dates. This is to ensure procedural fairness for all applicants.
- 5.6.2.9. Understand the non-disclosure of relevant information may result in the RACP rejecting your application and withdrawing support for your position.

#### 5.7. Applying for STTMS

- 5.7.1. All mandatory documents are in line with those stipulated by the MBA in their guidelines for STTMS. RACP outlines these mandatory documents on page two of the RACP STTMS Application Form. The RACP will only progress complete applications which have been submitted with all mandatory documents.
- 5.7.2. The College will not accept incomplete applications. It is the responsibility of the IMG and the employing hospital to submit a complete application for assessment by the RACP.
- 5.7.3. Any additional documents that are submitted, but not requested as mandatory documents, will be deleted by RACP.
- 5.7.4. The RACP may also request additional information or documentation aside from the mandatory documents outlined in the RACP STTMS Application Form.

### 5.8. Assessment process

- 5.8.1. The IMG must secure an appropriate training position in Australia and must apply to the AMC for primary source verification of their primary medical degree and specialist qualification(s), if obtained.
- 5.8.2. The IMG must apply for assessment with the RACP by submitting a complete application for a paper-based assessment of the proposed position and supervision arrangements. If, upon assessment, the RACP determines that the training position is suitable for the IMG:
  - 5.8.2.1. The RACP will complete part B of the AAMC-30 Form
  - 5.8.2.2. The IMG, employer contact and supervisors will be notified of the RACP's support for the proposed position via email, with the completed AAMC-30 Form attached.
  - 5.8.2.3. The RACP will upload the IMG's application to their AMC portal for AHPRA to access directly.
  - 5.8.2.4. The IMG is to apply for medical registration with AHPRA directly.
  - 5.8.2.5. The IMG will commence in the STTMS position and continue to advise the RACP of any changes to the position and/or commencement date.

#### 5.9. Extensions

- 5.9.1. The Individual extensions are considered on request from the employing hospital and the IMG.
- 5.9.2. Requests for extension are subject to review of an annual progress report and supporting documentation outlined by the RACP.
- 5.9.3. Extensions to continue practising on the STTMS pathway beyond 24 months will not be supported by the RACP. In line with the MBA guidelines, IMGs who intend to practise in Australia for more than two years need to meet the requirements for the competent authority pathway, standard pathway (AMC certificate) or specialist pathway (either specialist recognition or area of need).

#### 5.10. Timeframes for RACP assessment

- 5.10.1. The RACP has an eight week timeframe for processing applications. It is recommended that IMGs submit a complete application for STTMS at least three months before the expected commencement date.
- 5.10.2. Payment of the STTMS application fee must be made within 30 days for the application to proceed, or the application will expire.

#### 5.11. Fees

- 5.11.1. RACP charges the Short-term Training Application Fee which must be paid in full prior to the review of a new application for approval.
- 5.11.2. Additional fees may apply if changes are requested to an approved STTMS application. This includes changes to the approved sites, supervisors, dates and/or details of the training program.
- 5.11.3. Fees are approved by the Board each year and published on the RACP website.

## 5.12. Monitoring and evaluation of STTMS

5.12.1. AHPRA is responsible for monitoring IMGs under this pathway. The RACP does not monitor progress, unless an application for extension to remain on the pathway is received in which case the RACP will request an annual progress report along with any other documents deemed necessary by RACP.

#### 6. BREACH OF THE POLICY

6.1. Policy compliance is monitored by the OTP Unit within the RACP Professional Practice team. Breach of policy matters will be escalated to the OTP Committee when required.

#### 7. POLICY REVIEW

7.1. This policy will be monitored and evaluated by the OTP Unit within the RACP Professional Practice team. In line with RACP policy processes, this policy will be reviewed every three years to ensure ongoing relevance.

#### 8. LEGISLATION

- 8.1. College Privacy Policy
- 8.2. (2016) MBA Guidelines: Short-term training in a medical specialty for international medical graduates who are not qualified for general or specialist registration
- 8.3. (2016) MBA Guidelines: Supervised practice for international medical graduates

# 9. AUTHORISATION

Approved by [Insert] on [Insert Date]

# 10. **DEFINITIONS**

The following definitions apply for the purpose of this Policy:

| Term                              | Means   |  |
|-----------------------------------|---|--|
| "AAMC-30"                         | the Medical Board of Australia form to apply for short-term training in a medical specialty   |  |
| "AHPRA"                           | the Australian Health Practitioner Regulation Agency.   |  |
| "AMC"                             | the Australian Medical Council.   |  |
| "Board"                           | the Board of Directors of the College.  |  |
| "College"                         | The Royal Australasian College of Physicians, ACN 000 039 047, an incorporated body limited by guarantee.   |  |
| "Chapters"                        | the Chapters of the RACP, namely the Chapter of Addiction Medicine, Chapter of Palliative Care Medicine and the Chapter of Sexual Health Medicine. The Chapters each award distinct Fellowships (eg, Fellow of the Australasian Chapter of Palliative Medicine, FAChPM).                              |  |
| "Divisions"                       | the Divisions of the RACP, namely the Adult Medicine Division and the Paediatrics and Child Health Division.  |  |
| "Faculties"                       | the Faculties of the RACP, namely the Faculty of Occupational and Environmental Medicine, the Faculty of Public Health Medicine, and the Faculty of Rehabilitation Medicine. The Faculties each award distinct Fellowships (eg, Fellow of the Australasian Faculty of Public Health Medicine, FAFPHM) |  |
| "Fellow", "Trainee", and "Member" | have the same meaning as in the College Constitution.   |  |
| "IMG"                             | International Medical Graduates.  |  |
| "MBA"                             | the Medical Board of Australia.   |  |
| "OTP"                             | Overseas Trained Physicians.  |  |
| "STTMS"                           | Short-term Training in a Medical Specialty.   |  |

# 11. HISTORY

| Item | Amendment                                       | Date          |
|------|---|---------------|
| 1.   | Initial approval by College Education Committee | 21 April 2022 |
| 2.   |   |               |
| 3.   |   |               |
| 4.   |   |               |
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