



**ANZCA**  
FPM

*Te Whare Tohu o  
Te Hau Whakaora*

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Medical Council of New Zealand  
Wellington 6143

By email: [feeconsultation@mcnz.org.nz](mailto:feeconsultation@mcnz.org.nz)

Tēnā koe

## Consultation on proposed changes for medical college advice for registration in a provisional vocational scope of practice

### About the Australian and New Zealand College of Anaesthetists (ANZCA)

ANZCA, which includes the Faculty of Pain Medicine and Chapter of Perioperative Medicine, is the leading authority on anaesthesia, pain medicine and perioperative medicine. It is the professional organisation responsible for postgraduate training programs of anaesthetists and specialist pain medicine physicians, and for setting the standards of clinical practice throughout Australia and Aotearoa New Zealand. Our collective membership comprises 9649 fellows and trainees in anaesthesia and pain medicine, of which about 1300 work in Aotearoa New Zealand. ANZCA is committed to upholding Te Tiriti o Waitangi in the provision of competent, culturally safe care, and to promoting best practice and ongoing continuous improvement in a high-quality health system.

### Introduction

Thank you for the opportunity to provide feedback on the proposed changes to advice obtained from medical colleges regarding an international medical graduate's (IMG's) application for registration in a provisional vocational scope of practice. We have consulted with ANZCA Fellows from Aotearoa New Zealand and Australia who have experience and expertise with registration processes for international medical graduates.

Whilst ANZCA accepts that the proposed changes to

- rename the existing fee 'assessment of documents (preliminary advice)' to 'paper-based assessment'
- adjust the existing fee structure with the paper-based assessment becoming the higher fee, and the interview the lower fee
- include an annual inflation adjustment of 2.2% (or CPI) to proposed medical college advice fees

may reduce the timeframe for processing provisional vocational applications from IMGs for little cost, we do have strong reservations with primarily relying on paper assessments alone for registration of IMGs.

We recommend that you proceed with adjusting the fee structure including the annual CPI adjustment, which is in line with good practice, but do not remove the interview requirement or at least delay moving to paper-based assessments only until you have developed a set of indicators and measures to assess the risks and safety of this move, for both IMGs and patients.

## Paper-based assessments

ANZCA fellows who have conducted numerous and extensive interviews with specialist IMGs (SIMGs) have found that interviews are very valuable, providing an opportunity for a team of anaesthetists to explore gaps and/or contradictions in the information provided. In addition, there is always a lay person on the panel who provides a community perspective on ANZCA's judgment of their training qualifications and experience.

Paper-based assessments on their own are necessarily less reliable than when they are backed up by interviews. This is especially the case for SIMGs from those countries whose processes and standards are not as well-known to us because there are fewer IMGs coming from them, training is more variable, or there is greater variation in their registration processes. ANZCA can only see this proposed change working if the Council agreed to accept the Colleges recommendations for an interview being required. Currently this is not the case.

There is also a risk that primary reliance on paper-based assessment may lead to College's recommending a greater range of limitations on the positions the IMG may be able to occupy, whereas an interview allows for timely clarifications and further information if required. For ANZCA this change will mean that the 'additional information' that we require will be in a very expanded form for the SIMG to complete knowing that it is to be the final advice and the assessment will take longer to prepare. For these reasons we suggest that there may not be any reduction in the time taken to complete registration. We note that currently ANZCA's responses to MCNZ requests are efficient and within benchmark timeframes.

## Recommendations

In conclusion, we recommend that you:

- **Note** that we accept adjusting the existing fee structure and including an annual CPI increase
- **Note** our reservations with moving to paper-based assessments as the primary form of assessment for medical college advice for registration in a provisional vocational scope of practice
- **Agree** to accept the Colleges' recommendations where an interview is required and/or
- **Agree** to develop a set of indicators and measures to assess the risks and provide evidence of the safety of this move.

Thank you once again for this opportunity to contribute.

Nāku noa, nā



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