

## **Proposed arrangements for Specialists**

### **National Registration and Accreditation Scheme**

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## **General Comments**

CCEA concurs with the view that specialist recognition and endorsement should follow specific criteria and a genuine pathway for registration purposes only. The listed proposal requiring the need for a suitable post-graduate tertiary-level education and training program is essential. Similarly, that such a program should be accredited against specific specialist standards is also desirable and appropriate.

CCEA agrees that the profession specific accreditation body should have the role of developing the specific specialist standards against a backdrop of other international standards dealing with similar specialist programs. Having said the above, CCEA understands that the Australian Medical Council, together with the specialist medical colleges, already have a model in place which appears to operate well.

CCEA is of the opinion that the requirement for continuing competence of specialists is necessary. Competency documents in general have traditionally involved the accreditation bodies. However “continuing” competence requirements/standards (especially for registration purposes) which apply to individuals rather than formal courses has mostly been the responsibility of the Registration Boards to develop and administer.

Continuing competence requirements do have a variety of components, not just continuing education. Continuing education seminar and short course programs have traditionally involved the professions. Therefore the responsibility for minimum standards for continuing competence should be the responsibility of the National Board in consultation and collaboration with specialist colleges (or their equivalent).

Discussion regarding “area of need” registration and standards to accommodate this special registration category require caution and further thought. A clear cut definition is required, eg:

- Is it the intention for this to be an expanded practice or limited practice environment?
- What other requirements are expected?
- How will practicing in this environment differ from regular practice?

It is of concern to CCEA that the ability to register a practitioner, or determine a person's eligibility to apply for registration may not be a decision of the National Board. History has shown that a registration board has a pool of expertise to determine appropriateness of registration, including in areas of need. As new specialities are developed within a profession, it should be the respective registration board and accreditation agency that makes recommendations to the Ministerial Council regarding their adoption or otherwise. It should not be a decision that is influenced by other Boards that do not have the understanding of the profession.

CCEA believes that any lessening of current professional standards leads to a potential compromise of safety, and safety should remain the ultimate priority.

CCEA's initial thoughts would be that “area of need” considerations should be time, service and location specific, with very strict reporting and supervision provisions. This form of registration should be non-transferable.

Comments for specific proposals are as follows:

### ***Proposal 10.1.1 (registration arrangements)***

CCEA requests confirmation that the process for specialist endorsement will continue to be operational and available after 1/07/2010 to those professions who presently do not have specialist recognition and who may wish to pursue this at a later stage of their development and evolution.

***Proposal 3.4.2 (accreditation arrangements)***

For those professions which will develop specialist categories in the future, provisions and descriptions need to be included.

***Proposal 10.1.3 (registration arrangements)***

For those professions which develop registration endorsement of specialists in the future, provision of generic descriptions to cater for this need to be included.