

16 June 2023

Ms Robyn Kruk AO
Independent Reviewer
Regulatory settings relating to health practitioner registration and qualification recognition

Via email: HealthRegReview@finance.gov.au

Dear Ms Kruk,

Submission on implementation priorities: Interim report of the Independent Review of the regulatory settings relating to health practitioner registration and qualification for overseas health professionals and international students

Thank-you for the opportunity to provide feedback on priorities for implementation of the recommendations made in the Interim Report of the Independent Review of the regulatory settings relating to health practitioner registration and qualification recognition for overseas health professionals and international students (the Review). We believe the Review is undertaking important work to address urgent health workforce shortages occurring in Australia. The Review provides a critical opportunity to improve the experience of overseas health professionals seeking to enter Australia and practice.

I attach a joint submission from the Australian Health Practitioner Regulation Agency (Ahpra) and National Boards with this letter. Our submission is divided into three parts:

- work we already have underway to streamline and accelerate the assessment of skills and recognition of qualifications of overseas health professionals,
- priorities we have identified for implementation in the short and medium term, and
- resourcing future work critical to improving the experience of overseas health practitioners seeking to enter Australia.

We have appreciated the opportunities to engage with you and your team during the Review, and welcome further opportunities to work with your team towards the Review's conclusion. If you have any further queries regarding our submission, please do not hesitate to contact me.

Yours sincerely



Martin Fletcher
Chief Executive Officer, Ahpra

Summary of our submission

- Ahpra and National Boards welcome the Review's interim report recommendations which will improve the experience of overseas qualified health practitioners who apply to enter and practise in Australia.
- We have started work on key recommendations in the interim report and are keen to play our part with government, national regulators and agencies, accreditation bodies and specialist colleges in implementation.
- A previously identified barrier to implement the identified priorities by the Independent Reviewer is the significant costs of rapid change. Implementation of the recommendations will require more resourcing than what international applicants and Australian registered health practitioners can and should fund from their application and registration fees. To date, there has been no agreed funding via National Cabinet or Health Departments in response to our proposals and your interim report. In the absence of another funding source for these reforms, we will not be in a position to progress as recommended.
- Our submission covers:
 - work we already have underway,
 - priorities for the short and medium term, and
 - resourcing to support implementation

Work we already have underway

Ahpra and National Boards have been implementing agreed priority actions that we identified in our September 2022 National Cabinet submission to streamline and accelerate skills and qualifications recognition of overseas trained health practitioners. We have:

- Boosted assessment and examination capacity by creating an additional 500 examination places in 2023 for Internationally Qualified Registered Nurses (IQRNs) and midwives (IQMs). We have delivered five OSCE cycles, offered 1530 places for IQRNs, assessing 1489 candidates to date in the 2022-2023 FY. There are exam cycles planned for both IQRN and internationally qualified midwives in July 2023 where a further 350 IQRN and 7 IQM candidates expected to complete the profession specific exams. Ongoing negotiations with Adelaide Health Simulation continue to provide an expansion in exam cycles with additional days to continue the increased capacity throughout 2023 and 2023; We have also been working with the Australian Medical Council and the Australian Dental Council to progress the development of stable and reliable examination capacity.
- Accelerated our business transformation project. This will improve the experience of applicants and will make our processes more efficient. We are on track to deliver the first tranche of these improvements by August 2023.
- Significantly reduced the time to assess registration applications by increasing our staffing capacity.
- Introduced greater flexibility in relation to meeting English language requirements for registration by allowing an additional English language test for National Boards that accept the testing pathway with other improvements to follow in coming months. We are also reviewing the current English Language registration standard aiming to bring requirements in line with your recommendations for immediate action wherever possible.
- Improving our engagement with applicants, health professions, employers and recruiters on assessment for registration in Australia.

Complementing, and additional to, the above work, the Nursing and Midwifery Board of Australia (NMBA) has:

- concluded preliminary consultation on the planned *Registration Standard: General Registration for internationally qualified registered nurses*, which will provide an accelerated pathway to registration for eligible IQRNs from an NMBA approved comparable international regulatory jurisdiction (country, state or province);
- commenced a comprehensive review and evaluation, of the existing Orientation Modules Part 1 and Part 2 required to be undertaken by all Internationally Qualified Nurses and Midwives (IQNM) wanting to register in Australia. This review will ensure all IQNM possess and understanding of and education

in the Australian healthcare system and context and, critically Cultural Safety is key to providing safe and effective care to all Australian's especially Aboriginal and Torres Strait Islander Peoples;

- finalised the June 2023 Request to Tender to secure a second multidisciplinary assessment and examination centre in either Melbourne or Sydney by the end of 2023; and
- commenced a comprehensive review and evaluation of the current approach to workforce re-entry for nurses and midwives. This review will not only ensure more effective and efficient pathways, but further identify new opportunities for nurses and midwives re-entering the workforce.

We know there is more to do. Health Ministers are currently considering immediate priorities in response to the Interim Report, and we have started work to provide advice to Health Ministers regarding opportunities to expand the pathways for practitioners from competent/comparable jurisdictions to be 'fast tracked' for registration in Australia. These pathways will need to be safe and be based on evidence and best practice. They will cover key professions.

We continue to actively engage with the health sector. A current example is work we are doing with general practice stakeholders on opportunities to streamline the path for suitably qualified and skilled overseas qualified general practitioners to be registered to practice in Australia.

Priorities for the short and medium term

We have identified the following activities as critical to work on in the next six months:

- complete our agreed action items arising from our September 2022 National Cabinet submission on accelerating and streamlining the assessment of skills and recognition of qualifications for overseas based practitioners,
- implement agreed deliverables from our business transformation work to improve the experience of practitioners applying for registration. The introduction of a digital application process provides for efficiencies for both practitioners and Ahpra in the assessment process,
- complete our advice to Health Ministers on opportunities to streamline registration for practitioners who have been assessed as having comparable qualifications or from comparable regulators/authorities (competent authorities) across key professions, and
- complete the review of the National Boards' English Language registration standards (including public consultation as required by the National Law) and submit to Health Ministers for approval.

Work to remove duplication and streamline requirements between national agencies and regulators is critical to progress over the next six months to realise the full benefits in your review. This work will require the commitment of national government agencies and regulators if it is to be implemented successfully. Without will and commitment from national agencies, we cannot achieve this important goal. We are ready to work with the Commonwealth and their agencies to achieve this.

Resourcing to support implementation is critical

Resources will need to be allocated to Ahpra and National Boards if the recommendations are to be implemented quickly. As you know, Ahpra and National Boards are funded by the fees paid by registered health practitioners in Australia. Aside from small targeted grants, we receive no government funding.

The work to implement the identified priorities by the Independent Reviewer is significant, amounting to many millions of dollars. The following priorities will require major resources to achieve:

- Expanding 'fast track' registration for overseas practitioners by creating 'competent authority pathways' in priority health professions.
- Improving the applicant experience by removing duplication and aligning requirements between Commonwealth agencies and national regulators. This will require significant work on our operating systems, integration with other agencies and processes to implement as well as significant stakeholder commitment.
- Implementing our proposed role as the end-to-end steward of the assessment process for overseas based practitioners.

We believe that implementation of these much-needed reforms in a timely manner will require more than what registered health practitioners can and should fund. The quantum of funding necessary to make the changes in the recommended timeframes means it is not feasible, nor appropriate, for internationally trained health practitioner applicants and Australian registered health practitioners to be required to fund the costs via their application and registration fees.

To date there has been no agreed funding via National Cabinet or Health Departments to Ahpra in response to our proposals and your interim report.

It is our request that these issues are seriously considered during the development and finalisation of the plan to implement the agreed priorities arising from the review. We would welcome the opportunity to discuss these issues further with you or jurisdictional officers. Without additional funding from governments, we are unlikely to be in a position to implement your recommendations in the proposed time frames.

Conclusion

Ahpra and National Boards are fully committed to this work and are actively improving the assessment, recognition and registration process. We believe that the recommendations of the Review's Interim Report are on the right track and will be actively working with our partners to implement critical actions over the next six months. We welcome the support of the Review and the Commonwealth in implementing recommendations over the next 6 – 18 months.