

15 June 2023

Ms Robyn Kruk AO Independent Reviewer
c/o Department of Finance GPO Box 9958
Melbourne VIC 3001
By email: HealthRegReview@finance.gov.au

Subject: Submission for Independent Review of Health Practitioner Regulatory Settings

Dear Ms Kruk,

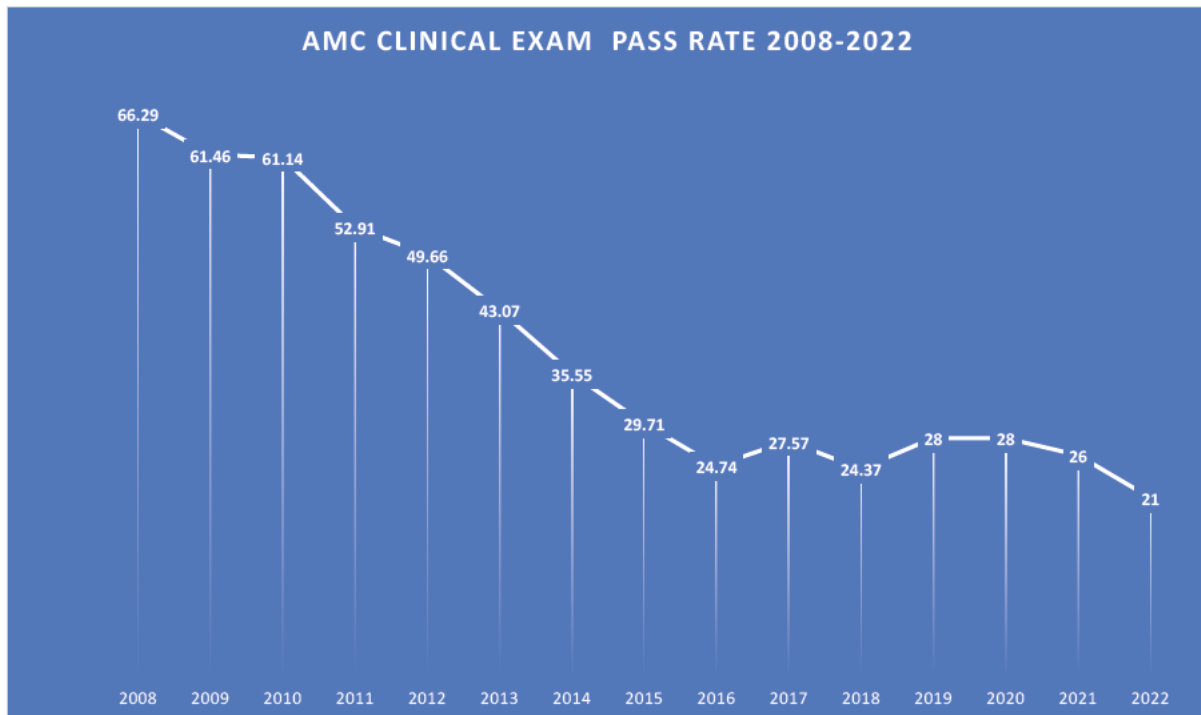
I am writing to provide my input and perspective as a medical professional regarding the Independent Review of Health Practitioner Regulatory Settings. I commend this initiative undertaking this important review, which aims to enhance the regulatory framework governing health practitioners and ensure the highest standards of patient safety, professional accountability, and ethical conduct within the healthcare sector.

As a generally registered psychologist and medical doctor with limited registration, I have witnessed firsthand the significance of robust regulatory settings in maintaining public trust and ensuring the delivery of safe, effective, and ethical healthcare services. I would like to contribute to this review by sharing my insights and recommendations on key aspects of my experience.

Having recently read the interim report, I felt compelled to write to you to raise some important additional issues not readily captured in the available report. Whilst I fully agree with the concerns surrounding the Australian Health Practitioner Regulation Agency (AHPRA) as the regulatory body responsible for overseeing the medical profession pertaining to its inefficiencies, ongoing delays, and burdensome administrative processes require urgent attention. However, it is equally imperative to direct our focus towards the Australian Medical Council (AMC), which operates with minimal oversight at all levels, and holds a significant position as gatekeeper of international medical personnel in Australia.

I am writing to express my deep concern and dissatisfaction regarding the significant fall in the pass rate of the Australian Medical Council (AMC) Clinical Exam over the past years. As an aspiring medical professional who has recently taken the exam, I feel compelled to bring this issue to your attention and request urgent action to address this concerning trend.

It is disheartening to note that the pass rate of the AMC Clinical Exam has plummeted from a respectable 66.5% in 2008 to a mere 21% in 2022. This sharp decline raises serious questions about the fairness, consistency, and overall quality of the examination process. As an exam that serves as a crucial gateway to medical practice in Australia, it is imperative that the AMC Clinical Exam accurately assesses the clinical competence and readiness of aspiring doctors while maintaining appropriate standards.



While some may argue that the decline in pass rates is a result of a decrease in the quality of international medical graduates (IMGs), this claim is contradicted by the nearly 100% pass rate observed in analogue workplace-based assessment processes, administered by the AMC which replace the need for a clinical examination.

Therefore, it is crucial to critically evaluate the examination processes and practices employed by the AMC. This includes a thorough analysis of the exam content, format, and scoring criteria to identify any potential shortcomings or biases that may contribute to the low pass rates. Additionally, it is essential to address the lack of transparency and consistency in the examination process, ensuring that candidates receive clear and constructive feedback to facilitate their learning and improvement.

While the focus of this submission is on the fall in the pass rate of the AMC Clinical Exam, it is crucial to recognize that both AHPRA and the AMC play integral roles in ensuring the integrity and quality of the medical profession in Australia. Therefore, it is essential that both organizations receive the necessary attention and scrutiny to rectify the issues at hand and maintain the highest standards of medical practice.

By acknowledging and addressing the concerns raised regarding both AHPRA and the AMC, we can foster a regulatory environment that upholds the principles of fairness, transparency, and accountability in the medical profession.

I would be pleased to provide further insights or participate in any consultations or discussions related to this review. Please feel free to contact me via the provided email address or phone number.

I appreciate the opportunity to contribute to this review and commend your efforts to improve the health practitioner regulatory framework. By addressing the identified areas of improvement, we can collectively enhance patient safety, maintain professional accountability, and foster a culture of continuous improvement within the healthcare sector.

Thank you for your attention to this matter. I would appreciate if you kept this submission confidential.

Sincerely,

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MBBS, PhD