



## Australian Health Ministers' Advisory Council National Registration and Accreditation Scheme

NRAS Subcommittee meeting (teleconference)  
5 February 2010

Agenda Item 3

### DETAILED DISCUSSION: FINAL PROPOSALS FROM NATIONAL BOARDS OF REGISTRATION STANDARDS, ENDORSEMENTS AND SPECIALIST REGISTRATION (RELEASED FROM 22.12.09)

#### Purpose of paper

To facilitate detailed discussion of the National Boards' final proposals as identified by NRAS-SC members on 27 January 2010, prior to formal consideration by the Australian Health Workforce Ministerial Council.

#### Recommendations

That members:

1. consider the document at Attachment A which identifies the final proposals for detailed discussion based on preliminary discussions at 27 January teleconference;

s22(1)(a)(ii)

3. agree that NRAS-SC feedback and agreed positions on the boards' final proposals will be recorded during the meeting to enable a response to be prepared;
4. agree the response will be circulated to members as per the outcome of discussions of Agenda Item 2 (process for feedback to national boards, AHMAC and AHWMC).

#### Background

On 27 January 2010, NRAS-SC members identified those final proposals put forward by National Boards that required further discussion. NRAS-SC views were informed by consultation within each jurisdiction.

A draft list based on discussions was circulated for comment to NRAS-SC members after the meeting. The draft list forms the basis for the document at Attachment A.

At the January meeting, NRAS-SC members supported out-of-session consideration of the final proposals to be negotiated (which could be facilitated by s22(1)(a)(ii) as the lead AHMAC member for NRAS matters). Please note that at agenda item 2 there is a discussion about the process to be used for conveying officials' feedback to National Boards, AHMAC CEOs and Ministerial Council.

#### Key Issues

The document at Attachment A identifies – in priority order – the final proposals for detailed discussion, and some brief dotpoints about the issues to be discussed. Some issues are substantive; others more editorial / seeking clarification of intent.

A summary list is as follows:

s22(1)(a)(ii)

s22(1)(a)(ii)

### 3. Podiatry Board of Australia

- specialist registration

s22(1)(a)(ii)

s22(1)(a)(ii)

NRAS-SC member feedback and agreed positions on the final proposals will be recorded during the meeting. As agreed, Mr Chris Robertson, AHPRA Director of Board Services will be in attendance for these discussions.

s22(1)(a)(ii)

### Attachments

Attachment A: Final proposals for detailed discussion by the NRAS-SC

s22(1)(a)(ii)

**ATTACHMENT A**

**FINAL PROPOSALS FROM NATIONAL BOARDS ON REGISTRATION  
STANDARDS, ENDORSEMENTS, SPECIALIST REGISTRATION**

s22(1)(a)(ii)

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### 3. Podiatry Board

Mandatory Registration Standards		
Name of Final Proposed Registration Standard	Requires detailed discussion? Y/N	Brief overview of issues for discussion

s22(1)(a)(ii)

Board specific registration standards, endorsements, specialist registration		
2. Specialist registration	Y	<p>CEOs supported the proposal for specialist registration for 'podiatric surgeons'.</p> <p>Queensland would like to raise for discussion the use of title 'surgical podiatrist' vs 'podiatric surgeon'</p>

s22(1)(a)(ii)

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# Proposals to the Australian Health Workforce Ministerial Council on registration standards and related matters

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## 2 Specialist registration

The National Law provides for boards to establish specialist registration with Ministerial Council approval. This involves two steps that the Board is progressing simultaneously:

- Ministerial Council approval of a profession as a profession for which specialist recognition operates under the law (except for medicine and dentistry, which will be specified in the legislation)
- Ministerial Council approval of a list of specialties for the profession (podiatric surgery).

### 2.1 Approval as a health profession for which specialist recognition operates

Podiatry should be approved as a health profession for which specialist recognition operates for the following reasons.

#### Existing specialist recognition

Podiatric surgeons are an existing specialty of podiatry. To perform surgery, podiatrists complete extensive specialised postgraduate training and education in podiatric medicine and surgery; they are qualified to manage bone, joint, ligament, muscle and tendon pathology of the foot and ankle. There are 22 podiatric surgeons in Australia and 18 registrars participating in the Australasian College of Podiatric Surgeons (ACPS) training program. In addition, there is a postgraduate course at the University of Western Australia – the Doctor of Clinical Podiatry.

Specialist registration of podiatric surgeons currently occurs in two states (South Australia and Western Australia). In the Australian Capital Territory, the *Health Professionals Act 2004* (ACT) also provides for specialist registration of health practitioners. There is no specialist register in other jurisdictions. The podiatry regulation authority in each of the jurisdictions without specialist registers [Tasmania, Victoria, New South Wales and Queensland] formally recognises the extended scope of practice of podiatric surgery through board policy. Registered podiatrists who comply with the requirements of the board's policy on podiatric surgery are able to practice this extended scope of practice in the jurisdiction.

Podiatric surgeons are recognised as accredited podiatrists, under the *Health Insurance Act 1973* (with). A register of Commonwealth accredited podiatrists exists for podiatrists who are accredited for the purposes of the *Health Insurance Act 1973*.

#### Protection of the public

Podiatric surgery is recognised by the podiatry profession as an extended scope of podiatric practice. Podiatric surgeons undertake complex and high-risk surgical procedures that can only be safely performed by practitioners with specialist training and skills. The specific risks and complexity of podiatric surgery require particular safeguards for the public.



Specialist registration for podiatric surgeons would protect public safety by ensuring that the title of podiatric surgeon is only used by practitioners with the necessary experience and skills to safely undertake these surgical procedures on the foot and ankle. This will enable patients to easily identify podiatrists with specialist skills in foot and ankle surgery and to seek and receive care from appropriately skilled practitioners who specialise in podiatric conditions. It would also assist the Board's regulation of the practice of podiatric surgeons.

If podiatric surgeons are not recognised as a specialty of podiatry, then the protection of public safety could be reduced, because the title will no longer be protected or recognised in jurisdictions where the specialty is currently recognised.

### Impact on the workforce

Recognising podiatric surgeons as a specialty under the proposed National Law has benefits for the podiatric workforce by providing interprofessional recognition for extended scope of practice. This supports career structures which will encourage podiatrists to develop specialist skills and improve the retention of highly skilled podiatrists in the health workforce.

### Current program of study

Three State and Territory podiatrist registration boards recognise the Australasian College of Podiatric Surgeons (ACPS) program as a requirement for specialist registration as a podiatric surgeon.

- The Podiatry Registration Board of South Australia recognises a Fellowship of the Australasian College of Podiatric Surgeons as the qualification for specialist registration.
- The *Podiatrists Regulations 2006* (WA) provide that the following qualifications are prescribed qualifications for the specialty of podiatric surgeon:
  - Master of Science (Podiatry) from Curtin University of Technology and member of, or eligible for membership of, ACPS
  - Master of Podiatry from Curtin University of Technology and member of, or eligible for membership of, ACPS
  - Doctor of Clinical Podiatry from the University of Western Australia.
- The *Health Professions Regulation 2004* (ACT) provides that to practise as a podiatric surgeon, a person must be unconditionally registered as a podiatrist and either be a fellow of the ACPS or eligible for fellowship.

If the Ministerial Council agrees to specialist recognition for podiatric surgery under the National Law, these programs of study will transition to the national scheme under the transition provisions in the new law.



To attain a fellowship of the ACPS, a podiatrist must complete an extensive training program. The ACPS training program has been regularly reviewed by the Australasian Podiatry Council.

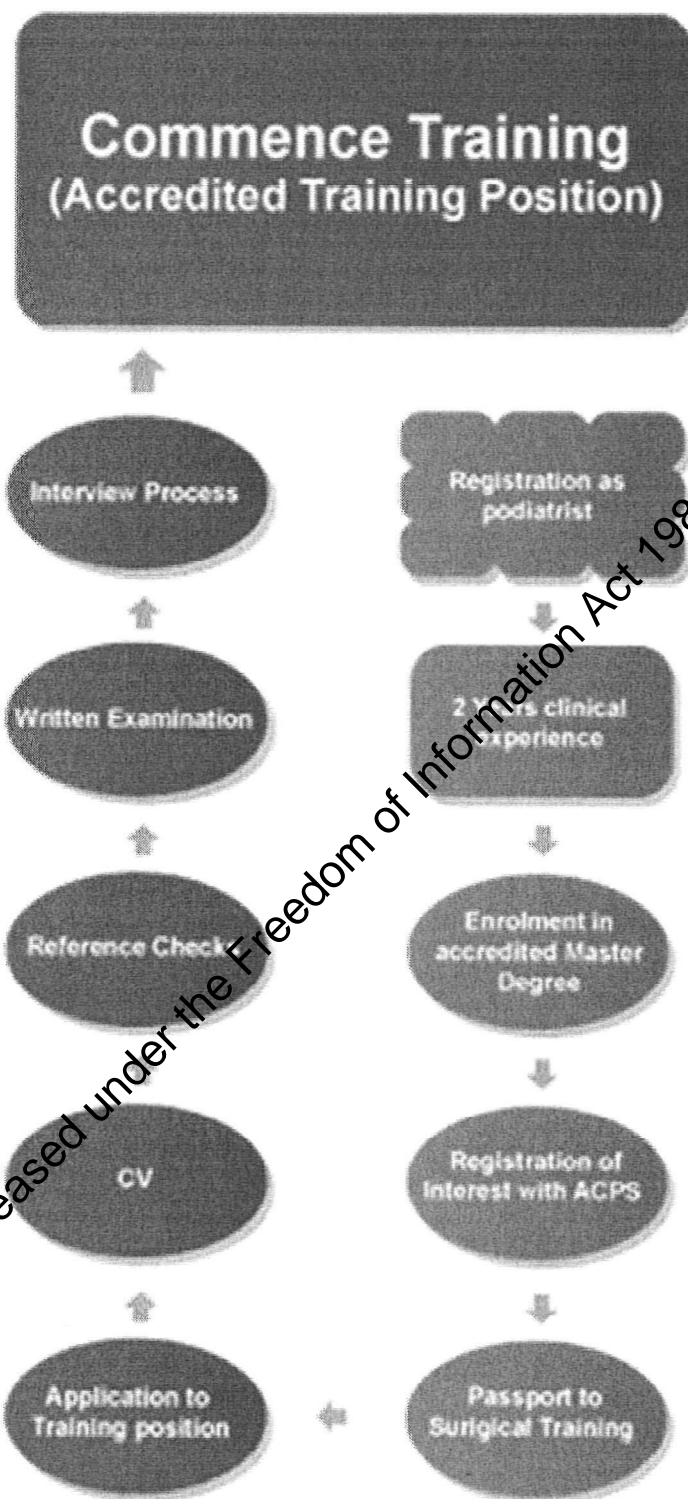
Prerequisites for admission into the ACPS training program include:

- an accredited degree in podiatry (four years equivalent)
- a minimum of two years of postgraduate podiatric clinical practice
- enrolment in an accredited master's degree (Accredited master's degrees may be offered in Australia or elsewhere.)
- submission of curriculum vitae and reference checks
- written examination
- an interview.

The ACPS training program is a three-stage process, which is summarised in the flowchart below. Further details are available in the ACPS training document (available at [www.acps.edu.au](http://www.acps.edu.au)). Training is both practical and theoretical, and includes the following activities and practices:

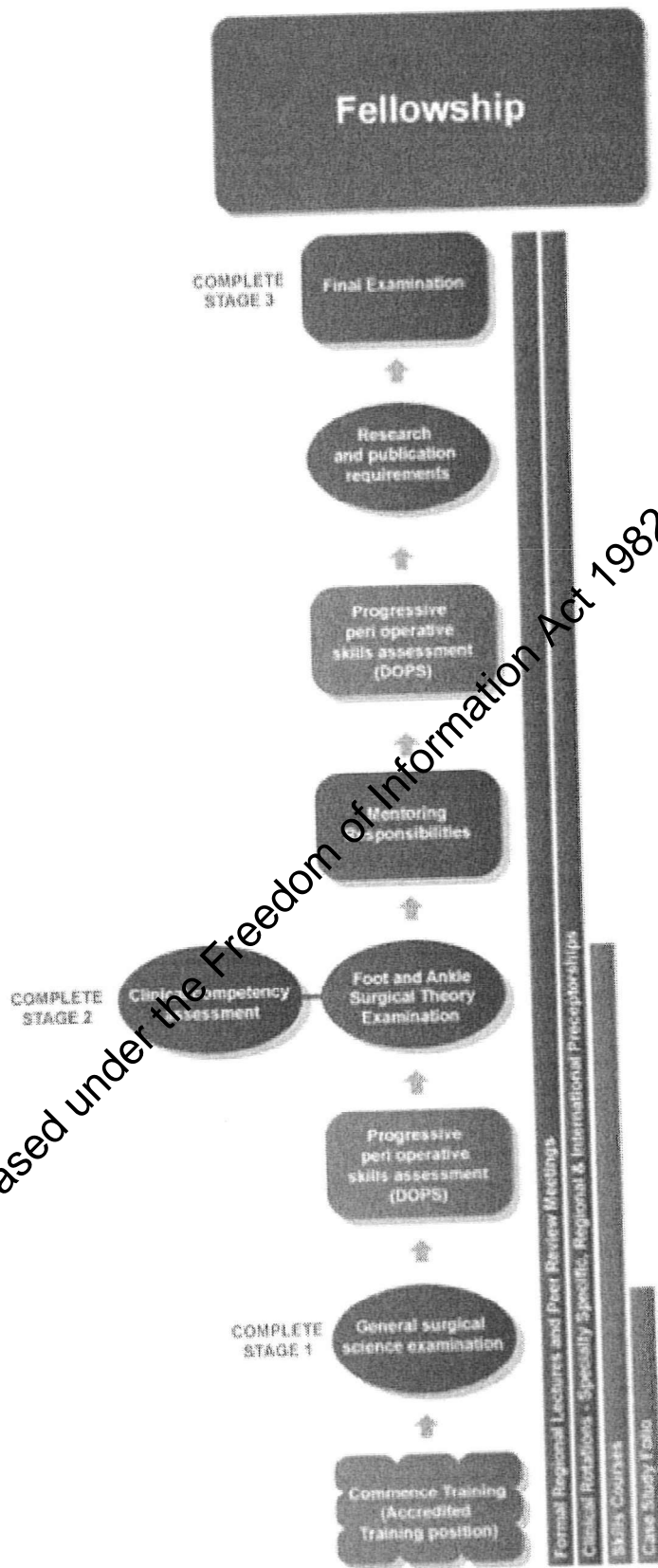
- lectures
- case studies
- skills development courses
- clinical rotations
- international preceptorship training
- peer review activities
- progressive development of preoperative, perioperative and postoperative skills
- mentoring
- research and preparation of publications.

Before attaining fellowship of the ACPS, the candidate must demonstrate a mastery of knowledge in foot and ankle surgery by passing practical, oral and written examinations. Candidates must maintain a log book of all surgical procedures that they observe, assist and perform. At time of initial fellowship, candidates have an average of 2500 logbook procedures.



Flow chart 1.  
Eligibility and Selection Process for a podiatric surgical training position.

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Flow chart 2.  
Surgical Fellowship Education and Training

Accreditation of fellows is maintained with a three-year, multifaceted program conducted by the ACPS, which includes peer review, clinical audit and continuous professional development.

### Postgraduate qualifications

There is a postgraduate course: the Doctor of Clinical Podiatry from the University of Western Australia, which provides theoretical and clinical knowledge in podiatric surgery.

### Work on a new specialist framework

The Australian and New Zealand Podiatry Accreditation Council (ANZPAC) has commenced a project to examine models of specialist accreditation that will fit the new environment of national registration and provide a report that outlines standards in specialisation within podiatry. This project will enable podiatric surgery and other specialties to be considered within a best practice framework. In the Board's view, the project promises a strengthening and adoption of a standardised best practice approach to processes for specialist accreditation in podiatry. The Board accepts the suggestion from the NRAS Governance Committee that the profession consult the Australian Orthopaedic Association on future training pathways and scope of practice. The Board has advised ANZPAC accordingly.

### Registration standards

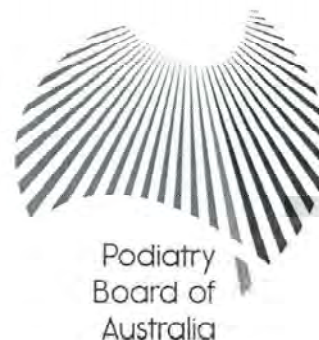
The Board has included some specific provisions in its proposed registration standards for podiatric surgeons (e.g. CPD). It will also consider further registration standards specific to podiatric surgeons.

## 2.2 Proposed list of specialties

At this stage, the Board is proposing specialist registration for podiatric surgeons as outlined in Section 2.1. The Board will return to the Ministerial Council if, at a later stage, the Boards wishes to make a proposal about further specialties in podiatry.

## References

The proposal should be read in conjunction with further information available on the ACPS website (<http://www.acps.edu.au/>), including the *Australasian College of Podiatric Surgeons' Continuing Professional Development Program Version 1.0. January 2007* and the University of Western Australia website: (<http://www.meddent.uwa.edu.au/podiatry/courses/postgraduate/dpodm>).



Podiatry  
Board of  
Australia

28 February 2010

The Hon John Hill MP  
Chair, Australian Health Workforce Ministerial Council  
Minister for Health  
GPO Box 2555  
ADELAIDE SA 5001

Dear Minister

#### Proposals for Ministerial Council approval

I am pleased to submit the attached revised proposals from the Podiatry Board of Australia on mandatory registration standards, specialist registration and an endorsement for scheduled medicines for the Ministerial Council's approval.

The proposals for registration standards, specialist registration and a scheduled medicines endorsement are submitted in line with schedule 7, clause 30 of the *Health Practitioner Regulation National Law Act 2009* (Old) (the National Law) for approval by the Ministerial Council under sections 12, 13 and 14 respectively of the National Law.

The proposals submitted relate to:

- criminal history registration standard
- English language requirements registration standard
- professional indemnity insurance arrangements registration standard
- continuing professional development registration standard
- recency of practice registration standard
- specialist registration, and
- endorsement for scheduled medicines.

Common minimum registration standards across all boards are proposed for criminal history matters and English language requirements.

The proposals have been subject to wide-ranging consultation as required in relation to registration standards, section 40 of the National Law. Comments have been received from the health sector, governments and other stakeholders. The Board received supportive advice from the Heads of all health departments across Australia on the matters under consideration.



I advise that the development of the proposals has been consistent with the Australian Health Practitioner Regulation Agency's *Procedures for Development of Registration Standards* which the Agency issued under section 20(1)(a) of the *Health Practitioner Regulation (Administrative Arrangements) National Law Act 2008* (Qld).

### ***Scheduled medicines endorsement***

With respect to the Board's proposed arrangements for scheduled medicines endorsement, the proposals contain the Board's proposed Registration standard for scheduled medicines endorsement, for approval by the Ministerial Council. There is also background information which provides some additional details of how the Board proposes to administer the endorsement arrangements, in order to ensure safe and effective prescribing practice by scheduled medicines endorsed podiatrists.

The Board requests that the Ministerial Council decide, in accordance with section 14 of the National Law, that the Podiatry Board of Australia may endorse the registration of suitably qualified podiatrists as qualified to administer, obtain, possess, prescribe, sell, supply or use Schedule 2, 3, 4 and 8 medicines for the treatment of podiatric conditions. The Ministerial Council is requested to approve an endorsement in relation to scheduled medicines, under section 14(2) of the National Law, along the following lines:

#### ***Class of health practitioners (section 14(2)(a)):***

Any person registered as a podiatrist under the National Law whose registration has been endorsed by the Podiatry Board of Australia under section 94 as qualified to administer, obtain, possess, prescribe, sell, supply or use Schedule 2, 3, 4 and 8 medicines for the treatment of podiatric conditions.

#### ***Class of scheduled medicines (section 14(2)(b)):***

Any Schedule 2, 3, 4 or 8 medicine used in the treatment of podiatric conditions included in a list of scheduled medicines approved by the Podiatry Board of Australia and published on the Board's website at the following address: [www.podiatryboard.gov.au](http://www.podiatryboard.gov.au)

#### ***Type of use (section 14(2)(c)):***

Administer, obtain, possess, prescribe, sell, supply or use.

These elements are incorporated into the Board's proposed registration standard for scheduled medicines endorsement that is also submitted to the Ministerial Council for approval, under section 12 of the National Law.

The Board has not yet established an approved list of scheduled medicines, but intends that the list would reflect the scheduled medicines currently available for podiatric use in at least one jurisdiction. The Board intends to consult widely on its proposed list of scheduled medicines, including with jurisdictions and other stakeholders. In addition, the Board has taken into account the establishment of the AHMAC Working Group on non-medical prescribing, and recognises the potential implications that the work of this group is likely to have on the scope of the scheduled medicines endorsement. The Board is also considering

establishing a Scheduled Medicines Advisory Committee to provide the necessary advice in managing the endorsement arrangements.

The Board looks forward to receiving the approval of the Ministerial Council for the attached registration standards under section 12 of the National Law, approval as a health profession for which specialist recognition operates under section 13(1)(c) of the National Law, approval for the list of specialties and specialist titles under section 13(2) of the National Law and approval of a scheduled medicines endorsement under Section 14 of the National Law.

Yours sincerely



Jason Warnock  
Chair  
Podiatry Board of Australia

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## Revised Proposals to the Australian Health Workforce Ministerial Council on registration standards and related matters

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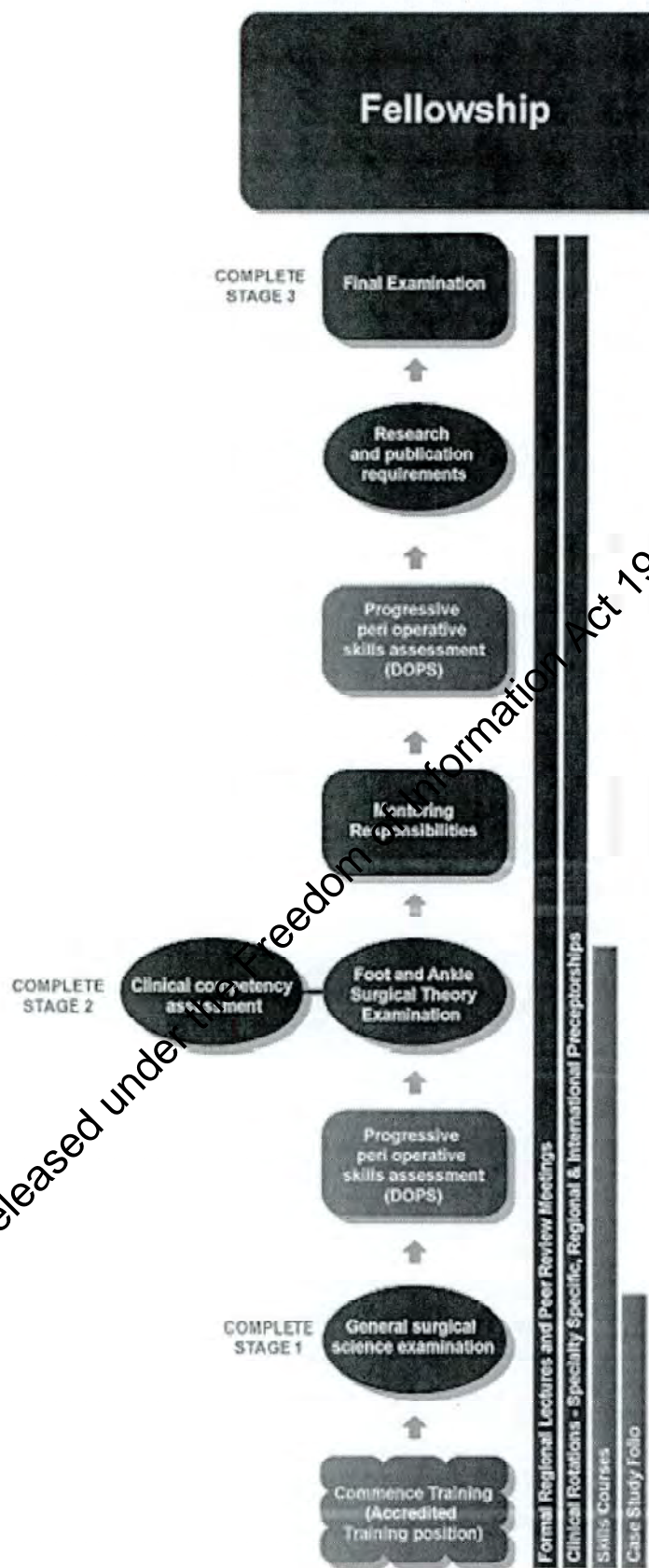
- lectures
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- progressive development of preoperative, perioperative and postoperative skills
- mentoring
- research and preparation of publications.

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# Flowcharts of training and fellowship processes



Flow chart 1.  
Eligibility and Selection Process for a podiatric surgical training position.



Flow chart 2.  
Surgical Fellowship Education and Training



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