



**Te Kaunihera  
Rata o  
Aotearoa**

Medical  
Council of  
New Zealand

## Extension of the provisional vocational assessment period from 18 to 24 months

### Executive summary

Te Kaunihera Rata o Aotearoa | Medical Council of New Zealand (Council) determines the requirements for International Medical Graduates (IMGs) to obtain registration in Aotearoa New Zealand before they commence practising medicine.

Noting the current health workforce pressures, particularly in the medical profession, it is important that Council continually reviews and updates registration policies and pathways to ensure they are fit for purpose and enabling.

### **Proposal**

Council is proposing to extend the provisional vocational assessment period from 18 to 24 months. This will enable a specific cohort of specialist IMGs who may not otherwise meet the standard, to gain provisional vocational registration and complete discrete training to address identified deficiencies in their qualifications, training and experience.

### **Introduction**

Council is required to define the separate areas of medicine and specialties that make up the practice of medicine in Aotearoa New Zealand. One of these areas (or '*scopes of practice*') is the Provisional Vocational scope of practice. This scope is applied to IMGs seeking registration in Aotearoa New Zealand to practise at specialist level. Doctors registered in this scope must generally work for six to 18 months in Council-approved employment and under approved supervision.

Council is also responsible for formally '*prescribing*' the specific qualifications that doctors must have to be eligible to be registered in each scope of practice. In some cases, the '*prescribed*' qualification will be an identified medical degree, or fellowship of a medical college, but in some cases, Council will require a combination of a medical degree and additional training, or approved experience.

This document constitutes Council's consultation under section 14(2) of the Health Practitioners Competence Assurance Act 2003 on one such update - a variation to the prescribed qualification for registration in the Provisional Vocational scope of practice.

### **Background**

An IMG seeking registration in the vocational scope of practice must first obtain registration in the provisional vocational scope. This is via the pathway for doctors who hold a postgraduate medical qualification which is **not** the prescribed New Zealand or Australasian postgraduate medical qualification. The registrant must work under approved supervision and in approved positions, and if applicable, complete certain assessment requirements, before applying for registration in the vocational scope of practice.

Practising within the provisional vocational scope allows for support and/or assessment of the IMG's practice while they become familiar with the New Zealand health system and the expected standard of practice.

The prescribed qualification for IMGs who do not hold an approved New Zealand or Australasian postgraduate qualification, to apply for provisional vocational registration requires a positive, individual assessment of their qualifications, training and experience. The detailed requirements are set out in Council's [Notice of scope of practice and prescribed qualifications](#).

There are **two elements** to that assessment. The applicant must have been assessed as:

- a. having qualifications, training and experience established to the Council's satisfaction to be *equivalent to, or as satisfactory as* that of a New Zealand vocationally-trained doctor registered in the same vocational scope of practice; and
- b. **being able to achieve registration in a vocational scope of practice within no more than 18 months** (fulltime equivalent (FTE)) of obtaining registration in a provisional vocational scope of practice.

For the purposes of this consultation paper, the second element (currently 18 months) is referred to as 'the provisional vocational assessment period' or 'assessment period'.

Council requests the relevant medical College to assess the application and provide advice on whether the combination of the IMG's qualifications, training and experience is *equivalent to* or *as satisfactory as* a New Zealand vocationally-trained doctor registered in the same vocational scope of practice.

On considering the advice from the medical College, the following assessment outcomes are:

- a. **Equivalent to** – if Council considers the combination of an IMG's qualifications, training and experience is *equivalent to* a New Zealand-trained doctor registered in the same vocational scope of practice, the IMG will be required to complete 6-12 months of satisfactory supervised practice to be eligible to apply for registration in the full vocational scope (supervision pathway).
- b. **As satisfactory as** – if Council considers the combination of an IMG's qualifications, training and experience is *as satisfactory as* a New Zealand-trained doctor registered in the same vocational scope of practice, the IMG will be required to complete 12-18 months of satisfactory supervised practice **and** some form of assessment (for example, a vocational practice assessment) to be eligible to apply for registration in the full vocational scope (assessment pathway).

#### **Proposal – extending the provisional vocational assessment period**

For applicants who are assessed to be *equivalent to* a New Zealand vocationally-trained doctor registered in the same vocational scope of practice, the assessment period is a lesser consideration, because there are no gaps or deficiencies in the IMG's qualifications, training and experience to address. However, for IMGs assessed to be *as satisfactory as*, the assessment period is a far more critical question given the gaps and deficiencies that will have been identified.

Noting that Council's existing pathway (VOC3 pathway) allows for registration in the provisional vocational scope of practice via the assessment pathway, the proposal is to extend the assessment period from 18 to 24 months.

### **Rationale for the proposal**

Extending the assessment period from 18 to 24 months would enable a specific cohort of IMGs who may not otherwise meet the standard, to gain provisional vocational registration and complete discrete training to address identified deficiencies in their qualifications, training and experience.

Noting the current health workforce pressures, particularly in the medical profession, it is important that Council continually reviews and updates registration policies and pathways to ensure they are fit for purpose and enabling.

### **Comparability with Australia**

The proposal to extend the assessment period for IMGs who may not otherwise be deemed to be *satisfactory as* and allow for discrete training to be undertaken, aligns with the partially comparable pathway to specialist registration in Australia.

Further information regarding specialist registration in Australia can be found at [Appendix 1](#).

### **Principles guiding the prescribing of qualifications**

In making this proposal, Council has also considered the principles outlined in section 13 of the HPCAA, which guide the prescribing of qualifications. That is, the qualifications must be necessary to protect members of the public; may not unnecessarily restrict the registration of persons as health practitioners; and may not impose undue costs on health practitioners or on the public.

Council's view is that the proposed qualification will maintain the high standard required of applicants for registration and reinforce the existing focus on the protection of the public. With reference to the guidance that section 13 provides, Council believes that the proposal will enable, rather than restrict, the registration of IMGs.

### **Your views are important**

To inform Council's decision-making you are invited to respond to the following questions.

#### ***Proposal***

Council is proposing to extend the provisional vocational assessment period from 18 to 24 months. This will enable a specific cohort of IMGs who may not otherwise meet the standard, to gain provisional vocational registration and complete discrete training to address identified deficiencies in their qualifications, training and experience.

1. Do you support the proposal to extend the assessment period from 18 to 24 months?
2. Do you see any potential adverse consequences or risks, and if so, how can they be mitigated?
3. Do you have any other comments regarding the proposal?

### **Submissions**

We invite you to provide feedback. This will be considered carefully before we make any decisions.

Please provide written submissions by completing the survey questions [online](#). Alternatively, you can email your submission to [consultation@mcnz.org.nz](mailto:consultation@mcnz.org.nz). The consultation closes on **13 December 2024**.

Any decision made as a result of this consultation will be shared with stakeholders and all consultation respondents.

**Publication of submissions**

We publish submissions at our discretion on our website. Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is requested.

Please advise us if you do not want all or part of your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation.

## **Appendix 1**

### **Specialist registration in Australia**

In Australia, an IMG applies directly to the relevant medical College, which will assess the IMG's qualifications, training and experience against an Australian-trained specialist practising in the same scope of practice. The College will undertake an assessment to determine whether the IMG's qualifications, training and experience are:

- a. partially comparable;
- b. substantially comparable; or
- c. not comparable.

If an applicant is deemed *partially comparable*, they must satisfy certain requirements before they are eligible to apply for specialist registration. To be considered partially comparable an applicant must satisfy the college that they will be able to reach the standard of an Australian-trained specialist within a maximum period of 24 months FTE supervised practice. The standard expected is that of an Australian-trained specialist *commencing* practice (at the level of a newly qualified Fellow), taking into consideration the IMG's intended scope of practice as well as their previous training and assessment, recent specialist practice, experience and CPD.

Applicants assessed as partially comparable will be required to undertake up to a maximum of 24 months FTE supervised practice and further training (together with associated assessment(s)) with a supervisor approved by the College. The IMG may be required to undertake formal examination(s) or other assessment(s).

The proposal to extend the assessment period for IMGs who may not otherwise be deemed to be *satisfactory as* and allow for discrete training to be undertaken, aligns with the partially comparable pathway to specialist registration in Australia.