

# Policy for specialist international medical graduate (SIMG) candidates

## Maintenance of Comparability Status on the Specialist Pathway



Authorising Committee/ Department	RANZCP Board
Responsible Committee/ Department	Education Committee
Document Code	POL EDN-SIMGE Maintenance of comparability status for SIMGs

### Contents

#### 1. Policy on maintenance of comparability status for SIMG candidates

This policy outlines the requirements for Specialist International Medical Graduate (SIMG) candidates accepted on to the RANZCP Specialist Pathway to comply with the requirements and maintain their comparability status during their entire specified time on the Specialist Pathway as they progress towards RANZCP Fellowship. It also outlines the ramifications if a SIMG candidate does not follow the requirements for maintaining their comparability status.

#### 2. Policy statement

The 2012 Fellowship Program, as governed by the RANZCP Fellowship Regulations 2012, aims to ensure that all who are awarded the qualification of RANZCP Fellowship have attained the level of competence required by the Fellowship Program for the practice of psychiatry.

#### 3. Purpose

The purpose of the policy is to ensure that all candidates demonstrate and maintain a high level of professional standards at all times, including an appropriately high level of clinical competence.

The RANZCP recognises its responsibility to the community as well as to Fellows and RANZCP SIMG candidates to set limits so as to maintain standards:

- If a candidate does not demonstrate the maintenance of an appropriate level of clinical competence and professional standards, the RANZCP may withdraw comparability status from the candidate.
- If a candidate has had registration withdrawn or have had significant conditions placed on their medical practitioners registration that impact on their ability to practice, the RANZCP may withdraw comparability status from the candidate.
- If a candidate has seriously breached ethical or other professional conduct standards, the RANZCP may withdraw comparability status from the candidate.

Withdrawal of comparability status for SIMG candidates, even for a limited time period, is a serious step and requires a careful process which is fair, allows for remedial interventions wherever possible, and which can be reviewed and revisited. This policy thus addresses both the grounds and procedure for withdrawal and also the remedial and review process.

#### 4. Comparability status on the Specialist Pathway

The outcome of the specialist assessment for SIMG applicants results in a comparability status being awarded to candidates who are accepted on the Specialist Pathway – either 'partial comparability status' or substantial comparability status'. The comparability status also includes a clear indication of the training and assessment requirements to be completed within a specified period of time.

The programs (substantial and partial) for which comparability status is conferred are designed for candidates in full time employment. There is an expectation that candidates will complete the partially comparable program requirements over a period of 2 years (full time equivalent – FTE) and substantially comparable program over a period of 1 year (FTE). Candidates will need to write to CSIMGE if they are employed part time to seek permission to be accepted on the Specialist Pathway. Partially comparable candidates with less than 0.5 full-time equivalent employment and Substantially comparable candidates with less than 0.6 full-time equivalent employment will not be accepted on the Specialist Pathway. It is also the responsibility of the candidate, where their proposed employment varies in any way from fulltime employment to obtain approval from CSIMGE of this proposal prior to commencement.

RANZCP is diligent in ensuring successful applicants hold appropriate qualifications and medical registration (as per RANZCP Training and Assessment Regulations). In order to maintain their comparability status, SIMG candidates must have current medical registration either from the Medical Board of Australia or Medical Council of New Zealand. Where an existing SIMG candidate has a condition or conditions placed upon his/her medical registration, the candidate must formally advise the Committee for Specialist International Medical Graduate Education (CSIMGE) of this change within fourteen days of issue of notification by the regulatory authority to the candidate. Failure to do so may be cause for disciplinary action that may include suspension or withdrawal of comparability status.

All SIMG candidates assessed for the Specialist Pathway are required to register with the relevant Australian or New Zealand Medical Board (Australian Health Practitioner Regulation Agency – AHPRA or Medical Council of New Zealand – MCNZ) within 12 months of receiving the letter advising them of the final outcome of their application for comparability status (final outcome letter) or upon commencement of practice within Australia or New Zealand. A specialist assessment outcome remains valid for 12 months from the date of issue.

It is the responsibility of the SIMG candidate to inform the RANZCP of their medical registration start date as soon as they have presented to AHPRA or the Medical Council of New Zealand and are registered. For medical registration obtained within 12 months of the date on the final outcome letter, the comparability status time will be adjusted to start from the date medical registration in Australia/New Zealand is granted.

It is also the responsibility of SIMG candidates that they start on the Specialist Pathway (partial and substantial) within 12 months of receiving the letter advising them of the final outcome of their application for comparability status (final outcome letter). If a candidate fails to start on the pathway within 12 months of the final outcome letter, they will need to reapply for the Specialist Pathway and pay all associated fees.

***All SIMG candidates enrolled under the RANZCP 2012 Fellowship Program are required to be aware of and adhere to the mandatory deadlines for elements of the Fellowship Program relevant to them.***

## **5. Employment requirements of the Specialist Pathway**

It is mandatory for SIMG candidates to have a confirmed job offer to accompany their application for specialist assessment. A duly signed 'Employer support form' indicating that the employer will support the candidate during their time on the Specialist Pathway must be provided with the application. The details of the accredited RANZCP supervisor, accredited for the 2012 Fellowship Program provided by the employer, should be specified in the form with the evidence of supervisor accreditation certificate provided. In the case where the applicant wishes to be enrolled in substantial comparability placement, the nominated supervisor must also be an accredited supervisor for the substantial comparability Specialist Pathway and be of a seniority level sufficient to meet candidate's needs. Candidate must include substantial comparability accreditation certificate of their supervisors with their application.

Please note if there is a delay between the specialist assessment outcome and candidates starting on the Specialist Pathway, the RANZCP may ask for a current 'Employer support form' at the time of starting on the Specialist Pathway.

During their time on the Specialist Pathway, candidates must be employed at all times unless they are currently in or have applied for break in comparability status (see the section on 'Break in Comparability status').

In case the partially comparable candidates on the Specialist Pathway have a change in employers, it is their responsibility to inform the RANZCP about the change in job within 14 days of finishing employment in the previous job. They are also required to provide a new employer support form from the new employer. If it is later brought to the attention of CSIMGE that candidates have moved jobs without informing the RANZCP, this time will not be considered accredited time on the Specialist Pathway, which in turn will affect their ability to meet the RANZCP Fellowship requirements in a timely manner.

In the case of substantially comparable candidates, it is expected that the candidate will remain in the same job at the same FTE component for the duration of the 12 (twelve) month placement. The CSIMGE will only consider changes of positions or FTE in special circumstances, which will be decided on a case by case basis (**see section 6.3 of the policy on Substantial Comparability requirements for RANZCP Fellowship**).

## 6. Maximum timeframe for completing Specialist Pathway requirements

The maximum timeframes for completing the Specialist Pathway requirements in accordance with AHPRA Guidelines (*Good practice guidelines for the specialist international medical graduate assessment process*) are:

*For partially comparable SIMGs* – a total of four years to complete 24 calendar months (FTE) of partially comparable requirements including summative assessments.

*For substantially comparable SIMGs* – a total of two years to complete 12 calendar months (FTE) of substantially comparable work place based requirements.

***Please refer to the respective policies on partial comparability requirements and substantial comparability requirements for details. Please also note SIMG candidates are allowed to have only three attempts at a RANZCP administered summative assessment.***

## 7. Withdrawal of comparability status on the Specialist Pathway

Withdrawal of comparability status implies that the candidate is automatically withdrawn from the Specialist Pathway (partial and substantial). The grounds for withdrawal are given in section 7.1 below.

### 7.1 Grounds for withdrawal of comparability status on the Specialist Pathway

- ***Serious breaches in ethical or other professional conduct:*** Withdrawal of comparability status can occur if a candidate:
  - has been de-registered by the Medical Board of Australia/Medical Council of New Zealand or has had conditions imposed on their registration due to ethics/conduct breaches
  - has breached the RANZCP Code of Ethics
  - has had their employment contract terminated due to serious problems regarding ethics, competence or conduct
  - has been involved in professional conduct unbecoming of a member of the RANZCP.
- ***Serious concerns regarding failure to progress towards RANZCP Fellowship***
  - Withdrawal of comparability status can occur if the CSIMGE has serious concerns

regarding a SIMG candidate's overall competence and their ability to progress to RANZCP Fellowship within the required timeframe.

Examples would be, but not limited to:

- Failure to successfully achieve work place based assessments on the Substantial Comparability placement within the specified time.
- Failure to successfully complete the RANZCP summative assessments in the Partial Comparability placement within the specified time.
- Failure to successfully complete two six-month terms on the Partial Comparability specialist assessment pathway.

Sections 13 and 14 of this policy provide further information on issues of ethics and professional conduct that may result in withdrawal from the Specialist Pathway.

***Please review policies outlining Partially comparable and Substantially comparable requirements of the Specialist Pathway for details.***

It is expected that SIMG candidates will be able to successfully complete the mandated training and assessment requirements of the 2012 Fellowship Program to proceed to admission to Fellowship at the end of the specified time of gaining comparability status. In the case of partially comparable candidates this time period is 24 months FTE and in the case of substantially comparable candidates this time period is 12 months FTE.

However, the RANZCP acknowledges that exceptional circumstances may arise which prolong a candidate's progression and therefore, in such cases an extension of time on the Specialist Pathway may be granted. In the case of partially comparable candidates, this can be up to a maximum of two further years and in the case of substantially comparable candidates for up to a maximum of one further year. Beyond this no further extensions will be considered. This extension is subject to ongoing medical registration with the Medical Board of Australia/Medical Council of New Zealand.

All requests for extensions will be considered by the CSIMGE on a case by case basis.

- *Failing to obtain medical registration from the Medical Board of Australia/Medical Council of New Zealand within the 12 months of the final outcome letter – see Section 4.*

Automatic withdrawal of comparability status occurs if the candidate fails to obtain medical registration within 12 months of the final outcome letter unless they notify CSIMGE (see below) or allows their medical registration to lapse.

If candidates are unable to obtain medical registration within 12 months of the final outcome letter, it is their responsibility to write to CSIMGE in a timely manner explaining their case and their planned intentions for obtaining medical registration and starting work in Australia/New Zealand. In addition, an intended plan for progression to RANZCP Fellowship, is required from the candidate.

- *Failing to join the Specialist Pathway (partial or substantial) within 12 months of the final outcome letter – see Section 4.*

Automatic withdrawal of comparability status occurs if the candidate fails to join the Specialist Pathway within 12 months of the final outcome letter unless they notify CSIMGE clearly giving their reasons for the late start. The CSIMGE will make decisions regarding the request for delay to start on the Specialist Pathway on a case by case basis.

Candidates will have to re-apply for the Specialist Pathway if they fail to start on the pathway within the 12 months and pay all associated fees for the new application.

## **7.2 Procedure for withdrawal of comparability status on the Specialist Pathway**

The procedures to be followed by the RANZCP with regard to withdrawal of a SIMG candidate's comparability status in specific situations are outlined below:

### 7.2.1 *Breach of the RANZCP Code of Ethics*

- Where a candidate has engaged in conduct unbecoming of a member of the RANZCP, the CSIMGE will refer the matter to the Membership Conduct Committee (MCC) for consideration.
- Where the RANZCP is notified of an alleged breach of the RANZCP Code of Ethics, the General Manager, Education and Training and Manager, Legal Services will notify the Chair, Education Committee and the Chief Executive Officer prior to any consideration of the matter.
- An alleged ethical breach will be referred to the Membership Conduct Committee (MCC) for their review, consideration and determination. Should a matter regarding a SIMG candidate be referred to the MCC, the relevant regulatory authorities may be informed at the discretion of the MCC.

### 7.2.2 *Termination of employment or suspension from clinical duties*

- SIMG candidates are required to report termination of their employment contract or any suspension from clinical duties to the RANZCP. On becoming aware of this, RANZCP staff will notify the CSIMGE in a timely manner of all the obtained information. RANZCP staff will inform the SIMG candidate involved that they are entitled to write to the CSIMGE on their own behalf to explain their circumstances.
- The CSIMGE will consider the matter and make appropriate recommendations to the Education Committee.
- The Education Committee and then the Board, upon receiving advice from the CSIMGE, will consider the matter and advise the candidate in writing of their decision.

### 7.2.3 *Failure to progress on the Specialist Pathway*

- SIMG candidates who fail to start the pathway within one year of the final outcome letter from the date of issue, show no progress or unsatisfactory progress towards Fellowship may have their comparability status on the Specialist Pathway revoked.
- Candidates on the Substantial Comparability program will have their progress initially assessed by the Substantial Comparability Assessment Review Panel (SCARP) which will make a recommendation to CSIMGE, giving their reasons.
- Candidates on the partial comparability program will have their progress assessed by the Partial Comparability Assessment Review Panel which will make a recommendation to CSIMGE.
- The CSIMGE will consider the matter and formally advise the Education Committee of any recommendation to withdraw the SIMG candidate's comparability status due to failure to meet progression requirements.
- The Education Committee upon receiving advice from the CSIMGE will consider the matter and put forward any recommendation for withdrawal to the Board.
- The Board will consider the matter and if approved, the Education Committee will advise the SIMG candidate in writing of their decision.

### 7.2.4 *Medical Board of Australia/Medical Council of New Zealand de-registration or lapse of registration or conditional registration*

- Upon receiving advice that the candidate has been de-registered, or allowed their registration to lapse or had condition/s imposed, RANZCP staff will forward this advice to the CSIMGE.
- The CSIMGE will consider the matter and formally advise the Education Committee of any recommendation to withdraw the SIMG candidate's comparability status.
- The Education Committee upon receiving advice from the CSIMGE will consider the matter and put forward any recommendation for withdrawal to the RANZCP Board (the Board).
- The Board will consider the matter and if approved, the Education Committee will advise the SIMG candidate in writing of their decision.
- Where conditions are placed on a SIMG candidate's medical registration in Australia/New Zealand, the CSIMGE will review the conditions to determine:
  - whether any additional supports or remedial assistance are required; and
  - whether comparability status can be maintained with those conditions in place.
- If the decision is taken that comparability status cannot be maintained, the process as for de-registration is followed.

## 8. Re-application to Specialist Pathway

- For any re-application to the Specialist Pathway from the SIMG candidates who have been withdrawn from the pathway (see section 7), the candidate will have to first seek permission from CSIMGE to re-apply. Candidates will need to provide evidence that the conditions that led to their withdrawal no longer apply.
- SIMG candidates who have been withdrawn from the Specialist Pathway due to failure to progress in the specified time period or because of the expiry of their maximum comparability status time will not be permitted to re-apply for specialist assessment at a later date.
- In relation to SIMG candidates who have been withdrawn from the Specialist Pathway because of issues related to the breach of the RANZCP Code of Conduct, their re-application for the Specialist Pathway will depend on decisions taken by the RANZCP Board and the CSIMGE will be guided by those decisions.
- All re-applications will need to include all associated fees as for a new application. The re-applications will follow the same process of assessment as set for other new applications (see [Flowchart of Specialist Pathway and Area of Need application process](#)).
- The new Specialist Pathway assessment outcome may not necessarily result in the same outcome as the previous Specialist Pathway assessment and the program requirements current at the time of the outcome will apply.
- Reapplication from SIMG transition candidates will be considered on a case by case basis. Transition candidates are defined as those SIMG candidates who were on the RANZCP Specialist Pathway (2003 Program) at or before 1 January 2016 and were transitioned to the 2012 Fellowship Program on January 1, 2016; and held medical registration in Australia or New Zealand at that time.

Please note re-assessment of comparability status once SIMG candidates have been initially assessed can only occur if there has been a material change to their training and experience since they were initially assessed by the RANZCP. A SIMG may apply for re-assessment of comparability only where they can provide evidence of a further significant period of training or experience that is verifiable and acceptable to the RANZCP.

## 9. Extension of comparability status (for partially comparable candidates)

The Partial Comparability program is designed for candidates in fulltime employment with an expectation of completion over a period of two calendar years (FTE) of all requirements. If any candidate has exceptional circumstances and has a delay in their progress toward Fellowship, OR is otherwise unable to meet the specified time requirements, then CSIMGE may consider an application from the candidate for an extension of time. Applications will be considered on a case by case basis. Applications submitted to CSIMGE should include (as relevant):

- an outline of reason/s for delay in progression to Fellowship
- supporting documentation for exceptional circumstances
- a Progression plan by the candidate (see section 9.1)

It is expected that full time partially comparable candidates will complete the requirements of the Specialist Pathway in 24 months. At 24 months a progress report will be submitted to AHPRA by the RANZCP, specifying the Specialist Pathway requirements that have been completed by that time.

The maximum timeframe on the pathway will be four (4) calendar years, subject to ongoing registration with the Medical Board of Australia or Medical Council of New Zealand. This is to enable part time candidates to complete the program and to allow for unexpected sick leave etc. CSIMGE can decide to review any candidate's progress and continuation on the pathway on a case by case basis at any stage of the Specialist Pathway.

No extension for the Partial Comparability Specialist Pathway will be given beyond four years.

- Partially comparable candidates are also required to successfully complete their summative assessments (Modified Essay Questions Examination, Critical Essay Question examination, OSCE and any other summative assessment specified in their final outcome letter) in three attempts. Failure to pass these summative assessments in three attempts will result in a requirement for the SIMG candidate to submit a Pathway Progress review application to CSIMGE as to why they should be allowed a further attempt at assessment and continue towards Fellowship.
- If the CSIMGE decides not to extend the Specialist Pathway time or not give a further chance to sit the summative assessments, it will start the process of withdrawal of the comparability status as per section 7.2.
- SIMG candidates are required to apply for any extension of their comparability status (and Area of Need position, where applicable) at least six weeks prior to the expiry of their comparability status (and Area of Need position, where applicable) if they wish to maintain their RANZCP comparability status.
- SIMG candidates are required to maintain current comparability status for the whole duration of the Fellowship Program. If they do not maintain current comparability status for the entire Fellowship Program then they may be withdrawn from the Fellowship Program.
- Any extensions for the comparability status for the partially comparable candidates beyond the given expiry date will require candidates to complete a further specified number of Workplace based assessments such as Observed Clinical Activities (OCAs), Entrustable Professional Activities (EPAs) and In Training Assessments (ITAs) or any other requirements as determined by CSIMGE at the time of extension.
- SIMG candidates enrolled under the RANZCP 2012 Fellowship Program are required to be aware of and adhere to the mandatory deadlines for their relevant elements of the Fellowship Program.

## 9.1 Progression plan

- Approval of any extension is given by the CSIMGE based on educational grounds and subject to the candidate providing a realistic Progression plan that is focused on effectively addressing the identified deficient competencies and attaining Fellowship within the available extension period.

The CSIMGE will consider granting of extension on educational grounds where the candidate can demonstrate that they have only one outstanding requirement left to complete and submit an achievable Progression plan focused on successful completion of that requirement that is supported by the candidate's employer and supervisor.

- A Progression plan for example, to address failure in Objective Structured Clinical Examination (OSCEs) should include the following:
  - A statement of support from the candidate's employer supporting the plan and guaranteeing access to the additional supports/ placements required.
  - A statement of support from the candidate's supervisor/Director of Training that:
    - it is an achievable plan;
    - the support required is available; and
    - it addresses the candidate's requirements.

In addition, a Progression plan could include some or all of the following:

1. Specific examination preparation work individually supported by at least one experienced RANZCP Fellow (e.g. weekly to fortnightly OSCE trial sessions for at least three months; regular examination practice; weekly supervision sessions; attendance at specific OSCE preparation workshops where the candidate receives individualised feedback).
2. Engagement in psychiatric practice for a significant period of time where the duties relate directly to components of the OSCE such as working in an acute adult unit/service for three months; working in an adult community or rehabilitation team with sufficient

opportunities for this to relate to examination preparation; with access to appropriate preparation opportunities.

3. Addressing specific deficits identified by previous examination feedback and by supervisors or Directors of Training (e.g. language/cultural coaching; additional education).
4. Additional educational experiences (e.g. conference attendance) may be considered but all elements must be relevant to examination preparation.

- The plan must be presented to the CSIMGE before the candidate's comparability status expires.
- If the CSIMGE concludes that the plan is unrealistic or unable to be supported, it will not be approved.
- The CSIMGE takes no responsibility for organising any additional training, placements or preparation for applicants.

## 10. Special consideration

- Where a SIMG candidate believes there to be particular exceptional circumstances that significantly contributed to their failure to:
  - maintain an employment contract or;
  - progress towards achieving RANZCP Fellowship within the specified time period, this must be brought to the immediate attention of their supervising Fellow and the CSIMGE.
- The CSIMGE will consider any exceptional circumstances and will formally advise the Education Committee which in turn will inform the Board of its recommendations regarding withdrawal of the candidate's comparability status.
- The Education Committee and then the Board, upon receiving advice from the CSIMGE, will advise the candidate in writing of their decision.

## 11. Break in comparability status

A SIMG candidate on the Specialist Pathway (partial or substantial), who due to exceptional circumstances intends to interrupt their progression to Fellowship at any stage, must notify CSIMGE. Exceptional circumstances include for example a serious medical condition; need to care for a family member, or pregnancy/parental leave.

SIMG candidates may apply to the CSIMGE for a break in comparability status for a maximum of twelve months. SIMG candidates must be able to provide proof of exceptional circumstances to support the temporary suspension of their comparability status.

A break in comparability status notification form (see the [Forms and documents – overseas specialists](#) web page), that is completed and signed by the candidate's supervisor, and contains relevant supporting evidence, will need to be submitted to the CSIMGE at least one month before the proposed break in comparability status. Please refer to the Guidelines for breaks in comparability status for further information.

SIMG candidates on the substantial comparability pathway will not be able to attempt any formative or summative assessments while on a break in comparability status.

SIMG candidates on the partial comparability pathway are eligible to undertake Centrally Administered Summative Assessments while on a break in comparability status but are not able to undertake any other pathway requirements during this time. For candidates who are required to undertake the Psychotherapy Written Case, the therapy sessions cannot be completed while on a break in comparability status.

### 11.1 Process to follow to seek a break

It is the candidate's responsibility to apply for a break in comparability status from the CSIMGE in a timely manner as follows:

- Complete and submit the '[Break in comparability status notification form](#)' to the RANZCP

SIMGE team for review by the CSIMGE at least one (1) month in advance of intended date of commencement of break (see the closing dates on the Committee Assessment Dates on the [Forms and documents – overseas specialists](#) web page).

- Specify the start and end dates of the intended break; a maximum of twelve (12) months in break(s) throughout the entire candidacy is allowed.
- Provide a clear explanation of the reasons for the break in the comments area of the form and if need be in an accompanying letter.
- Attach supporting documentation as proof of specific circumstances, for example medical certificates.
- Ensure the candidate's supervising Fellow has signed the application for a break.

The application will be reviewed and the decision determined by the CSIMGE at its next scheduled (monthly) meeting.

Incomplete submissions will not be considered by CSIMGE.

*Candidates should also note:*

- The CSIMGE may request further evidence or explanation to support the break including, but not limited to: medical certificates, information from employers and pay slips.
- In the case of a break in excess of twelve (12) months, the candidate will generally be required to re-apply for the Specialist Pathway when ready to resume. The RANZCP is unable to predict the likely outcome of the re- application; such breaks may have implications for the SIMG retaining currency of progress in the training and assessment process as well as their comparability status.
- Current comparability status is one of the eligibility requirements to sit the centrally administered summative examinations under the 2012 Fellowship Program. Therefore, whilst on a designated break in comparability status, candidates will not be able to apply for any RANZCP examinations/ assessments nor complete any training requirements.
- Candidates are advised to be mindful in making their decision for a break in comparability status of the registration requirements of the Australian Health Practitioner Regulation Agency (AHPRA) or Medical Council of New Zealand in relation to their employment and progression to Fellowship.

## **12. Application for substantial comparability assessment from existing partially comparable transition candidates**

Transition candidates are defined as those SIMG candidates who were on the RANZCP Specialist Pathway (2003 Program) at or before 1 January 2016 and were transitioned to the 2012 Fellowship Program on January 1, 2016; and held medical registration in Australia or New Zealand at that time.

- Existing transitioned partially comparable candidates, who believe they meet the eligibility criteria for substantial comparability (refer to the [Substantial Comparability Placement](#) web page), may apply for a new comparability assessment.
- Partially comparable SIMG candidates who wish to apply for the Substantial Comparability Placement will be required to complete an entire new [Specialist assessment application form](#), submitted along with the supporting documents. The new application must be accompanied with all associated fees.
- Existing transitioned partially comparable SIMG candidates are required to have current comparability status at application for the Substantial Comparability Placement and for the whole duration of the Substantial Comparability Placement of up to 18 months, if accepted.
- All applications for a review of comparability assessment will be considered by the CSIMGE. While generally only a paper-based assessment will be required, in certain cases the CSIMGE may request an interview as well.
- Existing transitioned partially comparable SIMG candidates who are not found to be Substantially Comparable may continue on the Partial Comparability Placement to Fellowship.

- SIMG candidates who have been assessed as Substantially Comparable will be approved to commence in the next available cohort, once all placement and registration requirements have been met. New cohorts are expected to commence biannually.
- Applicants who are offered and accept the conditions of the Substantial Comparability Placement will be required to pay a Substantial Comparability placement fee. Failure to pay the placement fee may cause delay or deferral of the placement.
- All the conditions for the Substantial Comparability Placement, including employment, supervision and registration requirements need to be met by the start date of the placement. Not meeting these conditions may result in deferral of the placement to the next cohort start date.
- New SIMG candidates enrolled on the Specialist Pathway after 1 January 2016, with a partially comparable specialist assessment outcome at initial application will not be re-assessed for their comparability status, unless they can provide evidence of additional experiences to satisfy the CSIMGE for it to consider reassessment of the application.

### **13. Ethical and professional conduct**

- SIMG candidates are expected to abide by the policies of the RANZCP in particular the RANZCP Code of Ethics and Code of Conduct.
- SIMG candidates are expected to be respectful and courteous at all times to their colleagues, RANZCP members and staff of the RANZCP.
- CSIMGE will also monitor evidence from Workplace based assessments (such as EPA and ITA forms), referee reports, reports from external bodies (including employers) and Regulatory bodies.
- It is the responsibility of the SIMG candidate to notify the RANZCP within 14 days, if their medical registration is withdrawn or suspended, or conditions placed on their medical registration, or if they receive notice of any complaint to any medical registration authority.
- It is the responsibility of the SIMG candidates to notify the RANZCP within 14 days if their employment is terminated or they move to a new employment.

The monitoring of candidates will involve regular assessment of candidate's professional and ethical conduct throughout their time on the Specialist Pathway, including their interactions with the RANZCP and workplace. Any concerns identified by CSIMGE in relation to the above matters will be fully reviewed by the Committee, and where appropriate may result in SIMG candidate's withdrawal of comparability status as given in section 7.1 and 7.2 of this policy.

Please note in accordance with Australian Medical Council's *'Standards for Assessment Of Specialist medical Graduate Programs and Professional Development Programs'* the RANZCP is required to inform employers, and where appropriate the regulators, where patient safety concerns arise in assessment.

### **14. Personal declaration**

- It is the SIMG candidates' responsibility, as per the declaration signed in the Specialist Pathway assessment application form signed by SIMG candidates to abide with the terms agreed in the application form. They should be fully informed and aware of all requirements of the RANZCP, particularly rules, guidelines, time limits and policies in relation to the Specialist Pathway and the 2012 Fellowship Program, including information available on the RANZCP website.

If any aspect of the personal declaration is later found to be misleading or incorrect, this will constitute a breach of the RANZCP Code of Conduct and Code of Ethics and will lead to automatic withdrawal from the Specialist Pathway.

- It is important for SIMG candidates to be aware of the maximum comparability status time they have available to complete the requirements of the Specialist Pathway outlined in this policy, and are aware that no further comparability status time can be granted beyond the maximum comparability status time available for SIMG candidates to complete the prescribed assessments/additional training to Fellowship of the RANZCP.

## 15. Indemnity

The RANZCP will indemnify (unpaid) RANZCP-accredited supervisors provided they are acting in accordance with the approved RANZCP Committee regulations and governance structure and are complying with the RANZCP 2012 Fellowship Program regulations.

## 16. Privacy and confidentiality

As with all other training activities, the RANZCP and its supervisors must comply fully with the requirements of the Australian and New Zealand privacy legislation, as well as the RANZCP Privacy Policy, with regard to the collection and distribution of information pertaining to the maintenance of a SIMG candidate's comparability status. Discussions relating to SIMG candidate performance must be documented and maintained by the supervisor and the CSIMGE in accordance with the RANZCP Privacy Policy. Documentation relating to the SIMG candidate's performance during psychiatry training (and not, for example, employment or medical registration) remains the property of the RANZCP.

CSIMGE reserves the right to provide any necessary documentation to AHPRA and Medical Council of New Zealand as required by the Regulatory bodies.

## 17. Review of decisions

Any request by a SIMG candidate for review of a decision in relation to an unsuccessful assessment or other element of the assessment process should follow the education review process.

## 18. Successful completion of all requirements

SIMG candidates who have passed all assessments outlined in their 2012 Fellowship Program final outcome letter will be eligible to apply for admission to Fellowship with the RANZCP.

## 19. Monitoring, evaluation and review

The Education Committee shall implement, monitor and review this policy and report on anomalies and issues as these arise. This policy will be reviewed biennially and updated as required.

## 20. Definitions and abbreviations – to include the term and its meaning

CSIMGE	Committee for Specialist International Medical Graduate Education
RANZCP	The Royal Australian and New Zealand College of Psychiatrists
EC	Education Committee
Candidate	Specialist International Medical Graduate (SIMG) candidate enrolled on the Specialist Pathway of the RANZCP
Transition candidates	Transition candidates are defined as those SIMG candidates who were on the RANZCP Specialist Pathway (2003 Program) at or before 1 January 2016 and were transitioned to the 2012 Fellowship Program on January 1, 2016; and held medical registration in Australia or New Zealand at that time.
FTE	Full-time equivalent: the proportion of time compared to full time, where full time is 1.0.

Comparability status	Comparability status indicates the outcome of the specialist assessment for SIMG applicants. The outcome involves providing SIMG candidates with a partially comparable or a substantially comparable status and for a specified period of time.
Comparability status time	Time specified for which the comparability status time is valid.
AHPRA	Australian Health Practitioner Regulation Agency

## 21. Associated documents

1. **Policy:**
  - Reviews and Appeals Education Training Policy
  - Progression Requirements for Specialist International Medical Graduate (SIMG) Candidates: Partially Comparability requirements for RANZCP Fellowship
  - Progression Requirements for Specialist International Medical Graduate (SIMG) Candidates: Substantial Comparability requirements for RANZCP Fellowship
  - RANZCP Privacy Policy
  - RANZCP Code of Ethics
2. **Procedure:** Reviews and Appeals Education Training Procedure
3. **Forms:** Break in comparability status notification form
4. **Other:**

## DOCUMENT CONTROL

Responsible department: Education	Responsible position: Project Officer, Education and Training	Version: v.2.4
Responsible committee: Education Committee	Date approved by RANZCP Board:	V1.0 approved 8 May 2016

## REVISION RECORD

Date	Version	Revision description	Approval process
November 2022	v.2.4	SIMG candidates on the substantial comparability pathway will not be able to attempt any formative or summative assessments while on a break in comparability status.  SIMG candidates on the partial comparability pathway are eligible to undertake Centrally Administered Summative Assessments while on a break in comparability status but are not able to undertake any other pathway requirements during this time. For candidates who are required to undertake the Psychotherapy Written Case, the therapy sessions cannot be completed while on a break in comparability status.	EC approved (11/11/2022)
April 2021	V.2.3	Alignment of policy to change the Essay-style written examination to decoupled of Critical Essay Question (CEQ) and Modified Essay Question (MEQ). Amendment of Educational Plan to Progression Plan terminology.	EC approved (23/4/2021)

August 2020	V2.2	Change of terminology from Show Cause to Pathway Progress Review	Approved by CSIMGE (August 2020)
June 2017	V2.1	The policy updated and clarified especially in relation to employer support, notification of change in employment while on specialist pathway, professionalism and ethical and professional conduct.	Approved by CSIMGE (24 February 2017); EC (31 March 2017); CGRC (11 May 2017); Board (3 June 2017)
August – Oct 2016	v.1.0	Section 10 updated to clarify that only existing transitioning partially comparable candidates can seek re-assessment of their comparability outcome. For those joining the pathway after 1 January 2016 will be not re-assessed for their comparability outcome once they have received their specialist assessment outcome.	Approved by CSIMGE (25 August 2016); EC (7 Oct 2016); CGRC (November 2016); Board (26 November 2016)
April - May 2016	v.0.5	A number of revisions made to ensure that the policy clearly states the requirements and also applies to the substantial comparability (which was not the case for Link 19A/19B). The revised policy also clarifies the re-application process for the specialist pathway.	Approved by CSIMGE (4 April 2016); EC (11 April 2016); CGRC (28 April 2016); Board (8 May 2016)
November 2015	v.0.4	First draft of the maintenance policy based on original Link 19A/19B – Maintenance of exemption status	Approved by CSIMGE, EC (Oct 2015), CGRC (Oct 2015), Board (Nov 2015)