## Document Information

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| Related Policies:   | - Reconsideration, Review and Appeals Process Policy  
                     - Complaints Policy  
                     - Admission to Fellowship  
                     - Special Consideration for Assessment |
| Policy Replaces:    | N/A             |
1. **Purpose and scope**

The purpose of this policy is to define the assessment of Specialist International Medical Graduates (SIMG) referred to as Overseas Trained Oral and Maxillofacial Surgeon (OTOMS) seeking the right to practice in Australia according to the directions of the Board of Studies, OMS, the Medical Board of Australia and the Dental Board of Australia.

This policy defines the specialist assessment process, which aims to determine whether an OTOMS primary and specialist qualifications, specialist training, and consultant experience are comparable to those of an Australian or New Zealand-trained oral and maxillofacial surgeon.

OTOMS Applicants are assessed on their surgical qualifications and clinical experience in order to determine comparability with a surgeon who has trained in Australia or New Zealand in Oral and Maxillofacial Surgery.

The pathway to independent practice for OTOMS is via assessment by the Overseas Trained Specialist Sub-Committee. Any OTOMS seeking Fellowship of the College (FRACDS(OMS)) in order to practice Oral and Maxillofacial Surgery in Australia will be assessed in accordance with this policy.

The pathway for independent specialist surgical practice in the specialty of OMS culminates in obtaining Fellowship of the College by completing the OMS Training Program and the FRACDS (OMS) Final Examination. Under these circumstances the Australian and New Zealand jurisdictions and public can be assured both of the quality of training and the standards of the exit examination as all aspects are under the aegis of the College.

2. **Definitions**

   **Overseas Trained Oral and Maxillofacial Surgeon** - An OTOMS is any specialist Oral and Maxillofacial Surgeon who has gained their specialist qualification outside of Australia or New Zealand.

   **Specialist Recognition** - means full specialist registration in Australia.

   **Area of Need** - OMS positions that have not been able to attract a suitable local applicant can be declared as Area of Need (AoN) specialist position by the relevant state/territory health jurisdiction and advertised internationally. The Australian Medical Council (AMC) will request RACDS to assess AoN applicants.

3. **Committee Structure and Selection of Members**

   Assessment of applications and interviews will be conducted by the Overseas Trained Specialist Sub-committee (OTSC) which is a sub-committee of the Accreditation Committee. The Composition of the Overseas Trained Specialist Sub-Committee is as follows:

   **Membership**

   **Standing members**

   - Chair of the Accreditation Committee
   - 2 members of the Accreditation Committee
Members by invitation per application
- A SIMG who has been through the process, and
- A Community Member
- A Regional Director of Training in OMS

Ex officio
- President - RACDS
- Chair, Board of Studies - OMS
- Registrar – OMS

Technical members of the OTSC are selected based on their experience, qualifications and knowledge of the accreditation process and related issues; and their understanding of the College’s training standards and requirements.

All members will have to declare their conflicts of interest prior to the commencement of assessment and interview for each application.

4. Assessment Process

4.1. Applying for assessment

The College considers applications received under the following categories:
- Specialist Recognition: IMGs who wish to practice as an independent specialist in Australia or New Zealand
- Area of Need: IMGs who wish to work in a position designated as an Area of Need (AoN) in Australia.

All applicants for AoN Positions will be concurrently assessed for Specialist Assessment and against the specified requirements of a position in a confirmed area of need. All standards that apply to Specialist Assessment applicants will apply to AoN Applicants.

Eligibility criteria
All applicants for Specialist Assessment must meet the following eligibility criteria:

a. A Dental degree, which should be primary source verified;
b. Full registration as a dentist in Australia or New Zealand;
c. A Medical degree, which must be primary source verified;
d. Specialist qualifications in the field of Oral and Maxillofacial Surgery, which should be primary source verified;
e. If any of the above criteria are not met, the applicant will be deemed ineligible for Specialist Assessment.

Applying in New Zealand

Applicants seeking to practice in New Zealand should contact the Medical Council of New Zealand and the Dental Council of New Zealand directly to commence the application process.

Applying in Australia

Applicants for Specialist Recognition and Area of Need seeking to practice in Australia must submit the Application for Specialist Assessment in the Specialty of Oral and Maxillofacial Surgery to the RACDS along with the following attachments
i. Certified copies of primary and specialist medical qualifications and proof of primary
source verifications from the Australian Medical Council (to be submitted via the
MBA/AHPRA Portal);
ii. Certified copies of primary dental and specialist dental qualifications and proof of primary
source verification from the Australian Dental Council;
iii. A detailed curriculum vitae (CV);
iv. A letter of confirmation of service from each employer listed on the CV;
v. An audit, for, at a minimum, the most recent year of specialist practice;
vi. A list of a minimum of 3 nominated referees, including current place of employment and e-
mail addresses.

vii. Certificates of Good Standing/Registration Status for both medical and dental registration
from country of training and/or specialist practice;
viii. Certified copies of all relevant certificates, including certificate of Fellowship of specialist
medical and/or dental bodies;
ix. Evidence of participation in continuing professional development and quality assurance
activities;
x. Evidence of English Language Proficiency obtained within 2 years of the date of
application;
xii. Logbook data as evidence of clinical experience in summary format, indicating whether
primary or assistant surgeon;

4.2. Initial Assessment

A paper-based assessment will take place when all required attachments have been received
to determine eligibility against the above criteria.

Only relevant evidence provided for the purposes of assessment will be considered. If the
OTSC receives publically available information about an applicant that could impact the initial
assessment decision the College will follow the rules of procedural fairness, including
providing the applicant with the opportunity to make a submission about the information. This
will occur prior to any interview or assessment being undertaken.

The College will notify the Medical Board of Australia and Medical Council of New Zealand of
any information received by the college that raises concerns about a SIMG’s suitability for
registration.

4.3. Assessment at Interview

a. All eligible OTOMS applicants may be required to present for an interview.
b. The interview is not an examination but is for the purposes of clarifying details of the
applicant’s training and experience in Oral and Maxillofacial Surgery and assessing the
applicant’s standing in relation to an Australasian-trained OMS Specialist.
c. The interview will be conducted by the OTSC.
d. Interviews must take place face-to-face or via videoconference.
e. The Interview Panel will use the following criteria to assess a candidate:
   i. OMS training in comparison with the RACDS training program in its duration,
structure and content, assessments and supervision
   ii. Specialist qualifications and previous practice as an Oral and Maxillofacial Surgeon.
This includes clarification of documentation provided by the applicant
   iii. Experience as an Oral and Maxillofacial Surgeon in terms of case mix, use of
equipment and procedures, and compliance with good practice as promoted in
RACDS documentation
iv. Evidence of participation in continuing education and quality assurance activities. A continuous involvement in recent years is particularly important.

f. Every effort will be made to conduct the interview within 8 weeks of receipt of the application.

g. All costs related to the interview are born by the applicant, including videoconferencing costs if applicable. The College Council will set the fee that is applicable for payment by the applicant in advance of the interview.

h. Interviewers will fill out the Oral and Maxillofacial Surgery Training & Scope of Practice Assessment Tool, which will be forwarded to the applicant and to the Overseas Trained Specialist Working Group along with all application documentation.

i. Following interview, all OTOMS Applications will be assessed by the Overseas Trained Specialist Working Group.

4.4. Assessment Outcomes

There are three possible outcomes to the specialist assessment process

a. Not Comparable

b. Partially Comparable

c. Substantially Comparable

a. Not Comparable: OTOMS Applicants who meet one or more the following criteria are somewhat likely to be deemed Not Comparable to an Australian-trained OMS Specialist.

   i. Failure to demonstrate completion of a specialist training program comparable to the College OMS Training program, including a research component

   ii. Failure to demonstrate that specialist training in Oral and Maxillofacial Surgery took place after obtaining both medical and dental undergraduate qualifications.

   iii. Failure to demonstrate completion of a full year of surgery in general whilst occupying a post in a hospital that is approved for surgical training prior to the commencement of specialist medical training in the field of Oral and Maxillofacial Surgery.

   iv. Failure to demonstrate completion of a specialist training program in Oral and Maxillofacial Surgery which is at least 4 years in duration.

   v. Failure to demonstrate completion of a specialist training program which covers the full scope of Oral and Maxillofacial Surgery

   vi. Failure to demonstrate consultant level experience in Oral and Maxillofacial Surgery (Recently qualified OMS specialists should seek advice from the Education Officer, OMS via oms@racds.org before submitting an application).

   vii. Failure to demonstrate recency of clinical practice of Oral and Maxillofacial Surgery

   viii. Applicants who are found Not Comparable will be advised to consider withdrawing their application and to contact AHPRA for further guidance.

   ix. Applicants who are found Not Comparable or who have not yet obtained specialist qualifications in OMS may wish to apply for selection into the OMS Training Program.

b. Partially Comparable: This determination means that the overseas trained surgeon has provided evidence of completing a surgical education and training program but there is insufficient evidence to convince the College that he or she can practice as an independent surgeon in the Australian health system. OTOMS Applicants will be deemed Partially Comparable if:

   i. There is evidence of recent consultant level surgical practice in OMS; and

   ii. There is evidence of completion of a specialist training program that is broadly comparable to the College OMS Training program, including a research component;
but which does not necessarily cover the full scope and depth of the College OMS Training Program; and/or

iii. The applicant has not completed a comparable exit examination to the College Final FRACDS(OMS) Examination; and/or

iv. The depth and scope of surgical practice in OMS since the attainment of their surgical qualification is not of a sufficiently high standard or duration as to waive the need to sit the FRACDS(OMS) Examination

**Partially Comparable Specialist Recognition Requirements:** OTOMS who are deemed partially comparable will be required to complete some or all of the following requirements before being eligible for Fellowship of the College (FRACDS(OMS)):

1. Complete further training. The period specified may be from six months up to three years as deemed necessary to satisfy eligibility for the FRACDS(OMS) Examination
2. Enroll in a period of further training in an accredited RACDS training position
3. Undergo a period of supervised clinical practice in a training position approved by the OTSC
4. Undergo a practice visit during the period of supervised clinical practice
5. Maintain a logbook during the period of supervised clinical practice (as described in the HETOMS)
6. Pass the Final Examination in OMS within the number of attempts stipulated by the OTSC
7. Complete any specified up-skilling deemed necessary by the OTSC, including but not limited to the ASSET / EMST / CCriSP courses of the RACS
8. Complete any OMS Training Program assessments deemed necessary by the OTSC (further information available in the HETOMS)

All training in Australasia is supervised and includes clinical practice for the entire duration of training.

c. **Substantially Comparable:** This determination means that the overseas trained surgeon has been able to provide evidence to demonstrate substantial comparability to that of a surgeon who has completed the College OMS training program. The OTOMS will be deemed Substantially Comparable if:

i. There is evidence of recency of surgical practice in OMS; and
ii. There is evidence of completion of a specialist training program comparable to the College OMS Training program, including a research component; and
iii. There is evidence the applicant has completed an exit examination equivalent to the College Final Examination in OMS [FRACDS(OMS)] and the depth and scope of surgical practice in the specialty since the attainment of their surgical qualification is of a sufficiently high standard or duration as to waive the need to sit the Final Examination in OMS.

**Substantially Comparable Specialist Recognition Requirements:** OTOMS who are assessed as substantially comparable will be required to complete the following minimum requirements before being eligible for Fellowship of the College:

1. Undergo a minimum period of supervised clinical practice (12 months)
2. Maintain a logbook during the period of supervised clinical practice
3. OTOMS who are assessed as Substantially Comparable will be required to pass the Final Examination in OMS within a number of attempts to be stipulated by the OTSC. Exemption may be granted by the OTSC for all or part of the Final Examination process if equivalence as per Section 4.4 c. iii. is granted.
4. OTOMS who are assessed as Substantially Comparable may be required to complete a practice visit during the period of supervised clinical practice.

5. OTOMS in this category are eligible to apply for Fellowship upon satisfactory completion of their period of supervised clinical practice.

The College will notify the Medical Board of Australia and the Medical Council of New Zealand of any deviations that relate to the interim assessment decision.

4.4.2 Notification and Acceptance of Outcome:

Following the interview, the application and interview report are considered by the Overseas Trained Specialist Working Group (OTSC).

The OTSC will determine the outcome and, if applicable, set the specialist recognition requirements.

The OTSC will outline the outcome in a Report 1, which will be forwarded to the applicant and to the AMC for inclusion in the applicant’s MBA/AHPRA Portal.

The assessed OTOMS has three months from the date of notification to:

- Accept the outcome; or
- Reject the outcome; or
- Reject the outcome and commence the formal Reconsideration, Review and Appeal process.

Where an OTOMS is notified of an assessment recommendation and the College receives no response from the OTOMS within 90 days from the date of notification rejecting the recommendation it will be deemed as having been accepted and the availability to pursue an Appeal will no longer apply.

4.4.3 Validity of Outcome/ period of validity of Outcome:

OTOMS applicants have 2 years from the date of receipt of their outcome to demonstrate that they have commenced completion of their specialist recognition requirements unless otherwise stipulated by the OTSC. After which time re-assessment will be required.

OTOMS applicants have 2 years from the date of commencement of their specialist recognition requirements to complete their specialist recognition requirements unless otherwise stipulated by the OTSC.

4.5. Completion of Specialist Recognition Requirements:

4.5.1. Supervised Clinical Practice

a. Where it is agreed by the OTSC that an overseas trained oral and maxillofacial specialist’s training and experience is partially or substantially comparable to that of an oral and maxillofacial surgery consultant trained in Australia or New Zealand, satisfactory completion of a minimum period of 12 months of supervised clinical practice in a tertiary OMS unit with six monthly reporting is required.

b. The purpose of this period is two-fold.
Firstly, it allows the OTOMS the opportunity to be orientated to the Australian health care system and their workplace.

It also allows practising specialists to interact with the OTOMS in a clinical context to determine if he or she is performing at an appropriate level and to identify any areas of practice that might require improvement prior to obtaining Fellowship (FRACDS(OMS)).

c. The College is not responsible for finding suitable positions or funding. Details of the program for the period of practice under peer review must be submitted to the College for prospective approval by the OTSC using the Application for Supervised Clinical Practice.

d. The duration of the period may be extended by the OTSC on the basis of the Performance Reports.

4.5.1.1. Requirements for approval of supervised clinical practice:

a. The position must cover the full scope of OMS, as defined in the Handbook for Accredited Education and Training in Oral Maxillofacial Surgery (HETOMS);

b. Clinical Supervisors: At least two Fellows of the College approved by the OTSC must agree to act as clinical supervisors and to undertake ongoing assessment of the applicant’s surgical knowledge and skills and professional practice for the term of the assessment period.

c. The Fellows undertaking the assessment to submit progress reports to the College at intervals specified by the OTSC, for the term of the assessment period.

d. The applicant is to maintain a Log Book for submission to the College at specified intervals, for the term of the assessment period.

e. If the applicant has applied to gain Fellowship they will be required to participate in the College CPD program for the term of the assessment period.

f. At the completion of the period, the OMS OTSC will determine whether the requirements have been fulfilled or whether a practice visit is required.

4.5.1.2. Unsatisfactory Progress in Supervised Clinical Practice

a. Unsatisfactory progress in Supervised Clinical Practice will require remediation. Indicators of unsatisfactory progress include but are not limited to:

i. Failure of the Supervisor or OTOMS to sign the progress report for a period of supervised clinical practice.

ii. Unsatisfactory ratings on a progress report.

iii. Comments indicating significant barriers to progress from the OTOMS and/or clinical supervisor.

b. If the OTSC deems progress in supervised clinical practice to be unsatisfactory the following additional requirements may be imposed:

i. The period in question may not be accredited, and a subsequent extension of the remaining period of supervised clinical practice may be required to compensate for the unaccredited period.

ii. A practice visit, if not already required, may be required at this stage.

iii. If significant issues in a specific area are reported (i.e. communication) a specific up-skilling requirement may be mandated (i.e. completion of a communication course).

4.5.2. Practice Visit

a. The majority of OTOMS will require a Practice Visit during the period of supervised clinical practice. The initial decision regarding whether a practice visit will be required will occur during the Assessment stage. If required, the OTOMS outcome will reflect the requirement.
b. Partially or substantially comparable OTOMS who are not initially required to complete a practice visit may be required to do so later in the process. The OTSC reserves the right to impose this requirement in cases where unsatisfactory supervised clinical practice progress reports are received or where concerns regarding the appropriateness of a supervised clinical practice position are raised.

c. Broadly, the practice visit will entail a day of interviews and observation conducted by two Fellows (FRACDS(OMS)) of the College, or, assessors. The assessors will meet with the nominated supervisors and the OTOMS in question to discuss progress and any areas of concern. The assessors will also seek 360-degree feedback from colleagues, including allied health staff.

d. A practice visit report will be provided to the OTSC for consideration. Further action may be required.

e. In some cases, the OTSC will recommend a change to the original assessment outcome. It is possible that an outcome be changed to “Not Comparable” if significant gaps in appropriate clinical surgical knowledge are demonstrated.

4.6. Additional requirements and final assessment

4.6.1. The FRACDS(OMS) SST and Final Examination

The pathways for OTOMS specialist recognition is based on the outcomes of the OTSC assessment:

- Equivalent – no exam required
- Substantially comparable: Most OTOMS will be required to successfully pass the FRACDS (OMS) Final Examination.
  - OTOMS must pass this examination within 2 attempts unless otherwise stipulated by the OTSC.
  - The first attempt must occur during the period of supervised clinical practice.
  - Completion of this requirement must occur within the overall timeframe for completion of requirements, as stipulated in sections 4.4.3.
  - Some OTOMS may also be required to sit the Surgical Science and Training in Oral and Maxillofacial Surgery (SST) Examination.

4.6.2. Fellowship (FRACDS(OMS))

Once all specialist assessment requirements have been completed and deemed satisfactory by the OTSC and the Board of Studies, OMS, OTOMS will be provided with the relevant information required to apply for Fellowship (FRACDS(OMS)).

5. Appeals

Decisions relating to the assessment of OTOMS by the College may be appealed in accordance with the College’s Reconsideration, Review and Assessment Policy.

6. Reassessment

Applicants who have previously applied for recognition as a specialist and received an assessment outcome of not comparable may apply for reassessment subsequently, and a reassessment fee will apply, if the following conditions have been met:

- A period of at least three years has elapsed since the original outcome of assessment was advised to the applicant; and
• The applicant can demonstrate there has been a material change in their training and experience since they were previously assessed by the college and that they have undertaken a further significant period of training and/or experience that is verifiable and acceptable to the college.

7. Fees

7.1. An assessment fee is payable prior to the commencement of assessment.

7.2. An assessment fee is payable if an OTOMS is seeking fellowship by assessment.

7.3. Examination fees will apply to OTOMS who may be required to undertake the SST Examination and/or the Final Examination.

7.4. Fellowship fees apply where an OTOMS is approved by assessment or by undertaking OMS training or by sitting the Final Examination.

7.5. A reassessment will attract a full assessment fee

Note: Fees are determined annually by the College Council. Fee information is published on the College website at www.racds.org

8. Related Forms and Policies:

• Reconsideration, Review and Appeals Policy
• Oral and Maxillofacial Surgery Training & Scope of Practice Assessment Tool
• Application for Specialist Assessment in the Specialty of Oral and Maxillofacial Surgery
• Application for Supervised Clinical Practice
• Supervised Clinical Practice Progress Report