

# MORE DOCTORS FOR RURAL AUSTRALIA PROGRAM (MDRAP) GUIDELINES

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# 1. Defined Terms

The following terms are defined and have the meaning given below whenever they are used in these Guidelines.

| Term  | Description  |  |  |  |  |  |
|---|--|--|--|--|--|--|
| the Act   | Health Insurance Act 1973.   |  |  |  |  |  |
| 3GA<br>Program  | Section 3GA of the Act allows medical practitioners participating in approved workforce or training programs to provide professional services that attract Medicare benefits for a defined period. A 3GA program is one of the approved workforce or training programs.  |  |  |  |  |  |
| Overseas<br>Trained<br>Doctor<br>(OTD)                  | An Overseas Trained Doctor is a doctor who did not obtain their primary medical degree from an accredited medical school in Australia or New Zealand.  |  |  |  |  |  |
| Foreign Graduate of an Accredited Medical School (FGAM) | A doctor who was not:  |  |  |  |  |  |
| 19AA  | Section 19AA of the Act restricts doctors from claiming a Medicare benefit for professional services unless they are:  • recognised as a specialist by a specialist medical college; or  • participating in an approved training or workforce program (3GA placement); or  • a temporary resident with a section 19AB exemption. |  |  |  |  |  |
| 19AB  | Section 19AB of the Act restricts Overseas Trained Doctors (OTD) and Foreign Graduates of an Accredited Medical School (FGAMS) from claiming a Medicare benefit for professional services unless they work in a district of workforce shortage for a minimum period of 10 years.   |  |  |  |  |  |
| ACRRM   | Australian College of Rural and Remote Medicine.   |  |  |  |  |  |
| AHPRA   | Australian Health Practitioner Regulation Agency.  |  |  |  |  |  |
| DHS   | The Department of Human Services.  |  |  |  |  |  |
| District of Workforce                                   | A District of Workforce Shortage is an area identified as having below average access to doctors. This is determined using   |  |  |  |  |  |

| Shortage     | population data and Medicare billing information to get a GP to                         |  |  |  |  |  |
|--------------|---|--|--|--|--|--|
| (DWS)        | population ratio.   |  |  |  |  |  |
| Fellowship   | A qualification obtained from an accredited specialist medical                          |  |  |  |  |  |
|              | college leading to a specialist practice. Doctors who attain                            |  |  |  |  |  |
|              | fellowship can satisfy the requirements of section 19AA of the Act.                     |  |  |  |  |  |
| Guidelines   | The Department of Health More Doctors for Rural Australia                               |  |  |  |  |  |
|              | Program Guidelines.   |  |  |  |  |  |
| Health       | The Australian Government Department of Health.   |  |  |  |  |  |
| Junior       | Australian trained PGY3 to PGY5 doctor not on a fellowship                              |  |  |  |  |  |
| Doctor       | pathway.  |  |  |  |  |  |
| Medicare     | A Medicare provider number uniquely identifies a medical                                |  |  |  |  |  |
| provider     | practitioner and the practice location from which they perform                          |  |  |  |  |  |
| number       | professional services. Medicare provider numbers are issued by                          |  |  |  |  |  |
|              | the Department of Human Services (DHS).   |  |  |  |  |  |
| Modified     | The Modified Monash Model is a classification system that better                        |  |  |  |  |  |
| Monash       | categorises metropolitan, regional, rural and remote areas                              |  |  |  |  |  |
| Model        | according to both geographical remoteness and town size.                                |  |  |  |  |  |
| (MMM)        | For more information on the MMM system see:   |  |  |  |  |  |
|              | http://www.doctorconnect.gov.au/internet/otd/publishing.nsf/Conte                       |  |  |  |  |  |
|              | nt/Classification-changes   |  |  |  |  |  |
| Vocationally | A Vocationally Recognised doctor is a doctor who has obtained                           |  |  |  |  |  |
| Recognised   | Fellowship of a specialist general practice medical college.                            |  |  |  |  |  |
| (VR)         | Vocationally Recognised doctors have access to general practice                         |  |  |  |  |  |
|              | items in the Medicare Benefits Schedule.  |  |  |  |  |  |
| Vocationally | A vocationally registered doctor is a general practitioner who has                      |  |  |  |  |  |
| registered   | been placed on the vocational register or Fellows list held by                          |  |  |  |  |  |
|              | Medicare:   |  |  |  |  |  |
|              | <ul> <li>as a Fellow of the RACGP; or</li> </ul>  |  |  |  |  |  |
|              | as a Fellow of ACRRM or   |  |  |  |  |  |
|              | based on historical eligibility requirements for the  Vacational Pagister with Medicare |  |  |  |  |  |
|              | Vocational Register with Medicare.  |  |  |  |  |  |
|              | Vocationally Registered doctors have access to general practice                         |  |  |  |  |  |
|              | items in the Medicare Benefits Schedule.  |  |  |  |  |  |
| RACGP        | The Royal Australian College of General Practitioners                                   |  |  |  |  |  |
| RWAs         | Rural Workforce Agencies (RWAs) are government funded                                   |  |  |  |  |  |
|              | agencies that attract, recruit and support health professionals                         |  |  |  |  |  |
|              | needed in rural and remote communities. The RWAs are the                                |  |  |  |  |  |
|              | specified bodies responsible for administering the More Doctors                         |  |  |  |  |  |
|              | for Rural Australia Program.  |  |  |  |  |  |
| Register     | Register of Approved Placements maintained by DHS under                                 |  |  |  |  |  |
|              | section 3GA of the Act. Doctors placed on the Register satisfy the                      |  |  |  |  |  |
|              | requirements of Section 19AA of the Act.  |  |  |  |  |  |
| Permanent    | As defined in the <i>Migration Act 1958</i> .   |  |  |  |  |  |
| Resident or  |   |  |  |  |  |  |
|              |   |  |  |  |  |  |
|              |   |  |  |  |  |  |

| Australian |  |  |  |
|------------|--|--|--|
| Citizen    |  |  |  |
|            |  |  |  |

# 2. Introduction

The More Doctors for Rural Australia Program (MDRAP) supports non-vocationally recognised (non-VR) doctors to gain valuable general practice experience in rural and remote communities prior to joining a college fellowship pathway. The MDRAP also supports junior doctors and locums providing services in rural and remote communities.

The Royal Australian College of General Practitioners (RACGP) and the Australian College of Rural and Remote Medicine (ACRRM) offer pathways to general practice fellowship. For some doctors, the MDRAP will be the first step to joining a college fellowship pathway, providing general practice experience while participating in selection processes.

Section 3GA of the *Health Insurance Act 1973* (the Act) grants Medicare access to doctors who participate in an approved workforce or training program. The MDRAP is listed in the *Health Insurance Regulations 2018* (the Regulations) as an approved program under 3GA of the Act. Rural Workforce Agencies have delegated authority as the Specified Body to administer the MDRAP on behalf of the Department of Health

MDRAP participants will be able to access items in the Medicare Benefits Schedule (MBS) for medical practitioners (e.g. Group A7, A2 and some A11). Section 3GA of the *Health Insurance Act 1973* (the Act) also provides the legislative framework for the Department of Human Services (DHS) to place doctors on the Register of Approved Placements (the Register).

# 3. Eligibility

MDRAP placements are location specific. Applicants and locations must meet the eligibility criteria set out in these guidelines to be granted an approved placement.

The MDRAP is open to doctors who are Australian citizens, permanent residents and temporary residents. Eligible applicants for the MDRAP fall into the following categories:

- 1. doctors with prior general practice experience;
- 2. doctors without prior general practice experience;
- 3. doctors providing locum services (some requirements will be based on prior general practice experience); or
- 4. junior doctors gaining exposure to general practice.

All doctors are subject to the same basic eligibility criteria however the length of placement, education and fellowship application requirements vary depending on category.

#### 3.1. Eligibility criteria

To be eligible for an MDRAP placement **all** doctors must meet the following criteria:

- hold current registration with the Medical Board of Australia;
- have an offer of employment and have the necessary skills and experience to perform the role;
- provide evidence of appropriate support in place to meet supervision requirements if applicable;
- take active steps to join a college pathway within the defined period; and
- undertake general practice professional development activities.

## **3GA History**

Doctors who have completed a College led general practice training program (ie the Australian General Practice Training Program, the Independent Pathway offered by ACRRM, the Remote Vocational Training Scheme or the RACGP's Practice Experience Program) are not eligible for MDRAP.

The length of a doctor's history of participation in other section 3GA workforce programs will be considered when assessing MDRAP applications. Doctors who have previously been removed from a 3GA workforce program may not be eligible for the MDRAP. Doctors previously removed from a 3GA workforce program will need to supply additional documentation showing progress towards general practice fellowship.

## 3.2. Supervision

# Doctors without prior general practice experience

Doctors without prior general practice experience or with less than six months general practice experience must:

- work under level one supervision, as defined by the Australian Health Practitioner Regulation Agency (AHPRA) in their supervision standards for international medical graduates, for one month full time equivalent; and
- complete and lodge a "Plan for professional development and re-entry to practice" with AHPRA (as required by the AHPRA recency of practice registration standard).

The doctor must provide a copy of their supervision report to the RWAs within four weeks of completing level 1 supervision.

After the first month the supervisor will determine the appropriate level of supervision for the next twelve months based on the participant's competency.

Doctors who require supervision to maintain their medical registration must continue to work within the conditions set by the Australian Health Practitioner Regulation Agency (AHPRA).

#### **Junior Doctors**

Doctors in Postgraduate Year (PGY) 3-5 must:

- work under level one supervision, as defined by the Australian Health
  Practitioner Regulation Agency (AHPRA) in their supervision standards for
  international medical graduates, for a period equivalent to one month full time
  equivalent; and
- if the supervisor determines the doctor can demonstrate the required competency, work under level two supervision as defined by AHPRA in their supervision standards for international medical graduates, for a minimum period of five months.

Some presentations in general practice have an increased risk of adverse outcomes. This list of 'at risk' presentations is documented in Standard T.17 of the 2005 RACGP Training Standards. In the first six months, PGY 3-5 doctors must consult their supervisor before an 'at risk' patient leaves the practice/premises until the supervisor determines the doctor's competency.

After the six months the supervisor will determine the appropriate level of supervision for the next twelve months based on the participant's competency.

#### Doctors with prior general practice experience

Doctors with more than six months prior general practice experience do not have to meet specific supervision requirements for the MDRAP. However, a doctor's previous experience will be considered when assessing suitability to work at a specific location.

Doctors who require supervision to maintain their medical registration must continue to work within the conditions set by the Australian Health Practitioner Regulation Agency (AHPRA).

# 4. Eligible Locations

To be eligible for an MDRAP placement the practice location must be:

- in a District of Workforce Shortage (DWS); and
- in an area classified as Modified Monash Model (MMM) 2-7; or
- classified as an Aboriginal Medical Service or be the subject of a Ministerial direction under s19 (2) or s19 (5) of the Act

Practices participating in the MDRAP must:

- provide the support required to meet supervision obligations; and
- confirm they understand that the doctor must progress to a college fellowship pathway within the specified timeframe.

#### 4.1. Overseas Trained Doctors and 19AB

Overseas trained doctors are subject to location restrictions under the Act. To be able to access a Medicare benefit doctors subject to Section 19AB of the Act need a Section 19AB exemption.

Overseas trained doctors with an approved MDRAP placement working in a DWS will meet section 19AB requirements through a DWS class exemption. A class exemption covers a group or class of doctors who meet the conditions specified in the exemption, in this case, by working in a location classified as a DWS.

# 5. Education

General practice education contributes to improved patient safety and will support doctors to be competitive in selection for a college pathway.

Doctors who participate in the MDRAP must complete foundation general practice training modules provided by either the Royal Australian College of General Practitioners or the Australian College of Rural and Remote Medicine within 6 months of commencing on the MDRAP. The foundation modules are available online and provide an understanding of the Australian health care system and the context of general practice.

## **Professional development**

The AHPRA registration standard includes 50 hours of professional development annually. Doctors who participate in the MDRAP for a period greater than 12 months must ensure at least half of their annual professional development is relevant to general practice by completing education modules accredited or endorsed by a general practice college. Further information is available from the general practice colleges.

# 6. Length of Placement

The length of a MDRAP placement will depend on the eligibility category of the participant.

#### Junior Doctors and Doctors working towards a fellowship pathway

Junior Doctors have up to two years (fulltime) to experience general practice in a MMM 2-7 location. After this period they may seek an extension to their MDRAP placement, subject to the requirements outlined below.

Doctors working towards entry to a fellowship pathway will be granted an initial placement for 2 years. There will be an option to seek an extension beyond this. Participants seeking an extension must:

- provide evidence of at least 1 application to a college pathway; and
- undertake specific education activities as directed by the Rural Workforce Agencies.

Rural Workforce Agencies can approve leave for periods greater than 3 months (e.g. maternity leave). A period of approved leave is not counted towards MDRAP participation time limits. Up to two extensions may be granted for a period of one year each.

Total time on the program cannot exceed four years. Doctors who are accepted into a college pathway must commence on their scheduled date.

#### Locums

Participants providing locum services or gaining exposure to general practice will be granted a placement for a period of up to 1 year of full time equivalent (e.g. 40 hours per work week). The length of the approved placement will be based on the practice and community needs.

The maximum period to reach a year of full time equivalent is 2 years.

# 7. Extenuating Circumstances

Rural Workforce Agencies may consider the impact of personal circumstances on a participant's ability to join a fellowship pathway whilst participating in the MDRAP.

Rural Workforce Agencies have discretion to:

- extend a MDRAP placement;
- extend timeframes to complete education; or
- extend timeframes for applications to college pathways.

A doctor's placement can be extended for up to two years due to extenuating circumstances. The duration of an approved placement will depend on the individual circumstances.

Extenuating circumstances can include, but are not limited to:

- serious illness of the participant, or a member of their immediate family; or
- a significant unforeseen life event that affects the participant's ability to meet MDRAP requirements within the expected timeframes (e.g. death in the immediate family); or
- the general practice colleges' capacity to enrol an eligible doctor on a general practice fellowship pathway.

Supporting evidence requirements for extenuating circumstances are:

- a formal signed letter of support from the treating health professional; and
- confirmation of the condition and the related treatment requirements.

or

 a letter from a general practice college confirming the doctor is eligible to be placed on a college program at a future date.

The evidence supplied must be current and cannot be dated more than one month from the application for extenuating circumstances.

Supporting documents will not be accepted if they are from employees of a medical practice that is seeking to employ the doctor under the MDRAP. The supporting documents must present an independent opinion of the relevant medical condition, treatment requirements and available treatment options.

The Rural Workforce Agency medical advisor will offer an opinion on whether the supporting medical information is complete and demonstrates that the condition would either prevent or substantially impede the doctor's ability to meet the MDRAP program requirements. The medical advisor's opinion informs the recommendation made to the decision-maker and the final advice provided to the doctor.

If a doctor has extenuating circumstance there are provisions for the doctor to apply for an extension. Up to two years may be provided for extenuating circumstances. No further extensions will be granted to a doctor when they reach a total of four years on the Program.

Applications for ineligible locations will only be considered after an application for extenuating circumstances has been approved and with additional supporting documents confirming specific medical requirements cannot be met in eligible areas.

MDRAP exceptional circumstances applications are only available for doctors are already on the program.

#### 8. Removal

Rural Workforce Agencies may end a placement if a doctor does not continue to meet the requirements of the MDRAP. Reasons a participant can be removed from the MDRAP include:

- failure to comply with supervision requirements;
- failure to lodge a "Plan for professional development and re-entry to practice" within the required timeframe (participants with less than 6 months general practice experience);
- failure to complete foundation modules within the required timeframe; or
- failure to meet the professional development hours relevant to general practice;
   or
- failure to provide evidence of college pathway applications; or
- failure to provide documents on request; or
- failure to start an approved college placement on the nominated start date.

Participants who reach the maximum four year period will not be extended.

Participants will be notified of termination at least 14 days prior to a decision taking effect. Participants may request a review of the decision to terminate their placement.

# 9. Review of Decisions

The Rural Workforce Agencies will have an internal mechanism to review decisions and support procedural fairness. Decisions will be reviewed by an alternative decision maker within the Rural Workforce Agency.

Participants can request a review of a decision if they believe the Guidelines have not been applied correctly. Requests for a review of a decision must include:

a copy of the original application and decision; and

a supporting letter detailing how the guidelines were not applied correctly.

Request for a review of the decision must be lodged by the applicant within 28 days of the letter confirming the decision.

The Rural Workforce Agencies can refer a completed request for review to the Department of Health for a final decision, as the MDRAP policy owner, to review the application of the Guidelines or consider a specific circumstance not covered in the MDRAP guidelines.

The Department of Health will consider:

- the original decision;
- · the review of the original decision; and
- the intent of the MDRAP and the operation of the Guidelines.

The Department will not accept applications for a review of decision from individual participants. The Department will review decisions referred by the Rural Workforce Agencies to ensure the decision is consistent with the policy aims of the MDRAP. The final decision of the review will be made by the Department. The Department will respond directly to the Rural Workforce Agencies on the outcome.

# 10. Responsibilities

### 10.1. Participant

The participant's responsibilities include:

- Submitting all necessary paperwork at least six weeks prior to the proposed commencement on the MDRAP
- Obtaining formal general practice experience assessments from one of the Fellowship colleges
- providing evidence of application to a college fellowship pathway;
- commence working in the practice within 3 months of approved placement;
- continuously meeting their obligations under the MDRAP;
- providing documentation or evidence upon request by RWA or the Department;
- ensuring personal details are correct and up-to-date; and
- confirming the commencement date of the MDRAP placement and their Medicare provider number before claiming a Medicare benefit.

#### 10.2. Practice

The practice's responsibilities include:

- providing the support required to meet the participants supervision obligations;
- providing the support required to ensure the participant meets the obligations of MDRAP; and
- understanding the participant must progress to a college pathway within a specified timeframe.

## 10.3. Rural Workforce Agency

The Rural Workforce Agencies responsibilities include, but are not limited to:

 undertaking verification of doctors skills and experience and assessing suitability for a placement based on recruitment processes and the advice of a clinical advisor if applicable;

- determining if a doctor is eligible for an MDRAP placement;
- confirming a practice is in an eligible location for MDRAP;
- confirming a doctor's previous section 3GA placements to assist with eligibility;
- notifying doctors of the outcome of their MDRAP applications within 28 days of receipt;
- determining if a participant meets ongoing MDRAP requirements by obtaining evidence of supervision, participation in education and applications to college pathways if required;
- providing notices to participants confirming their removal from the MDRAP if they do not the meet MDRAP requirements;
- considering applications for extenuating circumstances and appeals of decision; and
- collecting information/data for reporting purposes.
- providing administrative support to participants during their placement;
- recommending the practice, employer or other designated person to provide the doctor with orientation to the community/practice, list of contact number of other local doctors/specialists and contact details of organisation and agencies able to provide assistant and support;

Rural Workforce Agency's clinical advisor will have a clinical function to provide advice to the Rural Workforce Agency as the Specified Body administering the MDRAP.

The clinical advisor may be required to provide advice on individual MDRAP applications, and may consider the following:

- assessing a doctor's suitability for a placement in a rural or remote community;
- applicant's supervision reports;
- exam results and progress to a college pathway; and
- extenuating circumstances (evidence including medical certificates or reports).

# 10.4. Department of Health

The Department's responsibilities include:

- the policy, guidelines and maintenance of the MDRAP;
- the application of section 19AB of the Act for MDRAP participants;
- the administration and maintenance of District of Workforce Shortage (DWS) and the Modified Monash Model (MMM);
- assessing review of decisions referred by the Rural Workforce Agencies; and
- reviewing the performance of the MDRAP.

#### 10.5. Department of Human Services

The Department of Human Services is responsible for issuing Medicare provider numbers to participants allowing them to claim Medicare benefits for eligible services whilst participating on the MDRAP. Applications for a Medicare provider number at a practice location will generally be processed within 4 weeks from the date of receipt with possible processing delays (up to 8 weeks) during peak period from December to March.

The Department of Human Services will notify the participant of the MDRAP commencement date and their provider number. Approved placements granted under section 3GA may not commence earlier than the applicant's date of entry on the Register. As a consequence there are no circumstances under which the Department will be able to grant a "backdated" placement approval.

The medical practitioner is only eligible to access a Medicare benefit from the time the practitioner's name is entered in the Register and a provider number has been issued.

# 11. Privacy

Participant information will be collected by the Rural Workforce Agencies for the purpose of determining eligibility and administering the MDRAP.

Personal information will be shared with other bodies responsible for the MDRAP including the Department of Health, Department of Human Services and all Rural Workforce Agencies. This information may also be used for monitoring and the evaluation of the MDRAP. All personal information is protected by law under the *Privacy Act 1988.* 

#### **Contact Details**

# **Rural Workforce Agencies**

**NSW Rural Doctors Network** 

Ph: (02) 4924 8000 Fax: (02) 4924 8010 www.nswrdn.com.au

Northern Territory Medicare Local

Ph: (02) 8982 1000 Fax: (08) 8981 5899 www.ntml.rog.au

Health Workforce Queensland

Ph: (07) 3105 7800 Fax: (07)3105 7801

www.healthworkforce.com.au

Rural Doctors Workforce Agency (South Australia)

Ph: (08) 8234 8277 Fax: (08) 8234 0002 www.ruraldoc.com.au

HR+ (Tasmania) Ph: (03) 6332 8600 Fax: (03) 6334 3851 www.hrplustas.com.au

Rural Workforce Agency Victoria

Ph: (03) 9349 7800 Fax (03) 9820 0401 www.rwav.com.au

Rural Health West - Western Australia

Ph: (08) 6389 4500 Fax: (08) 6389 4501

www.ruralhealthwest.com.au

# **Department of Health**

For further information regarding the MDRAP email: access.programs@health.gov.au

#### **Department of Human Services**

For information about Medicare provider numbers and Medicare benefits email: Medicare.prov@humanservices.gov.au

# General practice colleges

# The Royal Australian College of General Practitioners

For further information regarding college pathways and professional development contact:

RACGP National Office 100 Wellington Parade East Melbourne, VIC, 3002

Ph: 1800 472 247

The Royal Australian College of General Practitioners (www.racgp.org.au)

# The Australian College of Rural and Remote Medicine

For further information regarding college pathways and professional development contact:

ACRRM

GPO Box 2507

Brisbane, QLD, 4000 Ph: 1800 223 226

Australian College of Rural and Remote Medicine (www.acrrm.org.au)