

Review of the Education Services for Overseas Students (ESOS) Act 2000

Medical Deans Australia and New Zealand Inc (Medical Deans) is the peak body representing professional entry level medical education, training and research in Australia and New Zealand universities. The organization comprises the Deans of Australia's current eighteen medical schools and the two New Zealand schools.

The following brief submission focuses on two aspects of current arrangements for overseas students (aka as international students) in Australian medical school programs, namely:

- access to intern places
- the 10 year moratorium on access to Medicare Provider number.

1. Access to Intern Places

[Significant proportion of medical students are international students] Over the last five years, international fee paying students have accounted for almost one fifth of medical students in Australia. Whilst the proportion is slowly dropping as the significant increase in Australian medical students moves through the system, in 2009, international students accounted for 14.1% of commencing students, 16.6% of all students and 18.7% of graduates (projected).

[International students pay significant fees] International students pay significant fees to study Medicine at an Australian medical school. Program Fees in 2009 ranged between approx A\$38 000 - A\$55 000 per annum (program length varies between 4-6 years depending on whether undergraduate or graduate entry). International student fees significantly assist the resourcing of many medical programs.

[International students are highly valued] International students are valued in Australian medical programs. They bring knowledge and learnings of different cultures to the medical program, are trained to the same highest standards as their domestic counterparts, and graduate on the same basis as any Australian 'domestic' student.

[Significant increase in medical student numbers] The number of medical student graduates will increase by 90% between 2007 and 2012, part of a planned approach by the Australian government to rectify medical workforce shortages and maldistribution of the workforce.

[Intern year] On completion of their university-level training, medical graduates must complete a further year of supervised medical experience as an intern. Normally this training takes place in a teaching hospital in Australia. Satisfactory completion of the intern year provides the medical graduate with registration to practice in Australia.

[Access to training places, particularly intern places] This increase in student numbers has placed significant pressure on the ability of the health system to provide sufficient and quality places for clinical training during their university program.

The significant increase in student numbers has placed even greater pressure on the State health systems to provide guaranteed access to intern places (which the state jurisdictions fund). Whilst all states have currently guaranteed such places for 'domestic' graduates, international students have not been guaranteed such access. This means that international students, having graduated under exactly the same arrangements as 'domestic' students, may in future not be able to undertake their intern year in Australia and thus be registered as a medical practitioner in Australia.

[Potential negative outcome] Medical Deans believes that this lack of a guaranteed intern place has the potential to significantly deter prospective international students from undertaking their entry-level medical training at an Australian university.

In terms of the ESOS Act, the lack of guaranteed access to an intern place has the potential to detract from one of the Acts key objectives: *to protect and enhance Australia's reputation for quality education and training services.*

[Value to ameliorating medical workforce shortages] Significant medical workforce shortages are predicted for the immediate future. Much of that shortage is currently being addressed by accrediting International Medical Graduates (aka Overseas Trained Doctors) to work in areas of workforce shortage. There has been extensive commentary over the last few years as to the difficulties which many IMGs face, at least for the first few years, in understanding and working in the Australian health system and understanding the Australian culture.

Medical Deans believe that international students, trained to the standards required at an Australian medical school, and therefore already familiar with the health system and culture, provide an immediate valuable alternative to the employment of large numbers of IMGs. To effect this though, international students will need to be guaranteed an intern training place.

A recent informal survey by one of our member Schools of 100 international medical students revealed that 75% would be very likely to stay in Australia upon graduation and a further 20% likely to stay if there was the opportunity to do so.

In fact, over the past few years, international medical students have filled over 100 intern places per year. A number (not easily quantified) continue in PGY2, and above, positions.

[Solutions] Whilst clinical training is seen as a 'health' matter, it is important, we believe that this particular issue is considered also under 'education' as the matter overlaps both portfolios.

As part of the national health workforce reform strategy, attention must be given, in our view, to ensuring state and territory health systems guarantee access to an intern place for all international students who graduate from an Australian medical school. We recognize that this may mean an additional 'training' payment being made to the jurisdictions, the source of which requires further consideration.

Whichever way, a solution needs to be found quickly. It is vitally important that medical schools continue to enroll significant numbers of international students, and that these students in turn are able to at least get their medical registration in Australia following the completion of their studies.

[Sponsored students and requirements to return to home country on graduation] It should be noted that some international students may be admitted to Australian medical schools as part of a contractual arrangement with a sponsoring international government) and such contracts require the student to return immediately on graduation to placements within their own government's health service. None of the recommendations in this submission are intended to alter such contracts or requirements of such students.

2. 10 year Moratorium

[10 year moratorium to access of Medicare Provider Number] Under Section 19AB of the Health Insurance Act, overseas trained doctors and former overseas medical students are required to work in a district of workforce shortage for minimum period of 10 years in order to access Medicare benefits arrangements. These restrictions are often referred to as the 10 year moratorium.

[Definition of overseas student] Overseas medical students are defined as those students whose primary medical qualification was from an Australian medical school and who was not a permanent resident or an Australian citizen when he/she first enrolled at the medical school.

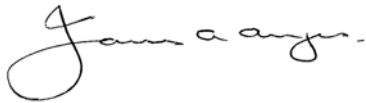
[Prospective amendments to the Act] A Bill to amend some of the restrictions for overseas medical students was introduced to Parliament last week. Medical Deans welcomes this development.

Notwithstanding these amendments, most international students will continue to be subject to some level of moratorium for a period following their registration as a medical practitioner. Prospective students need to be aware of the nature of any restrictions that may be in force when they wish to enter the workforce.

[Informing prospective students] Medical Deans has recently become aware of the fact that some international students had not been made aware specifically of the 'moratorium' at the time of considering enrolment into the medical course.

Medical Schools are keenly aware of the requirements of the ESOS Act and Migration Act and understand the need to be mindful that they do not give 'immigration advice' nor make any misleading statements about employment post MBBS course. However, in general, they are of the view, that potential international students should be alerted to the moratorium and be urged to make their own enquiries regarding their individual situation.

It would be useful for provisions to be made in the ESOS Act or regulations which facilitate the provision of such general advice by universities.

A handwritten signature in black ink, appearing to read 'James A. Angus'.

Professor James A Angus
President
2 November, 2009