



# Australia Area of Need Policy and standard operating procedure

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**Approved by:** Board

**Endorsed By:** State Branch Chairs

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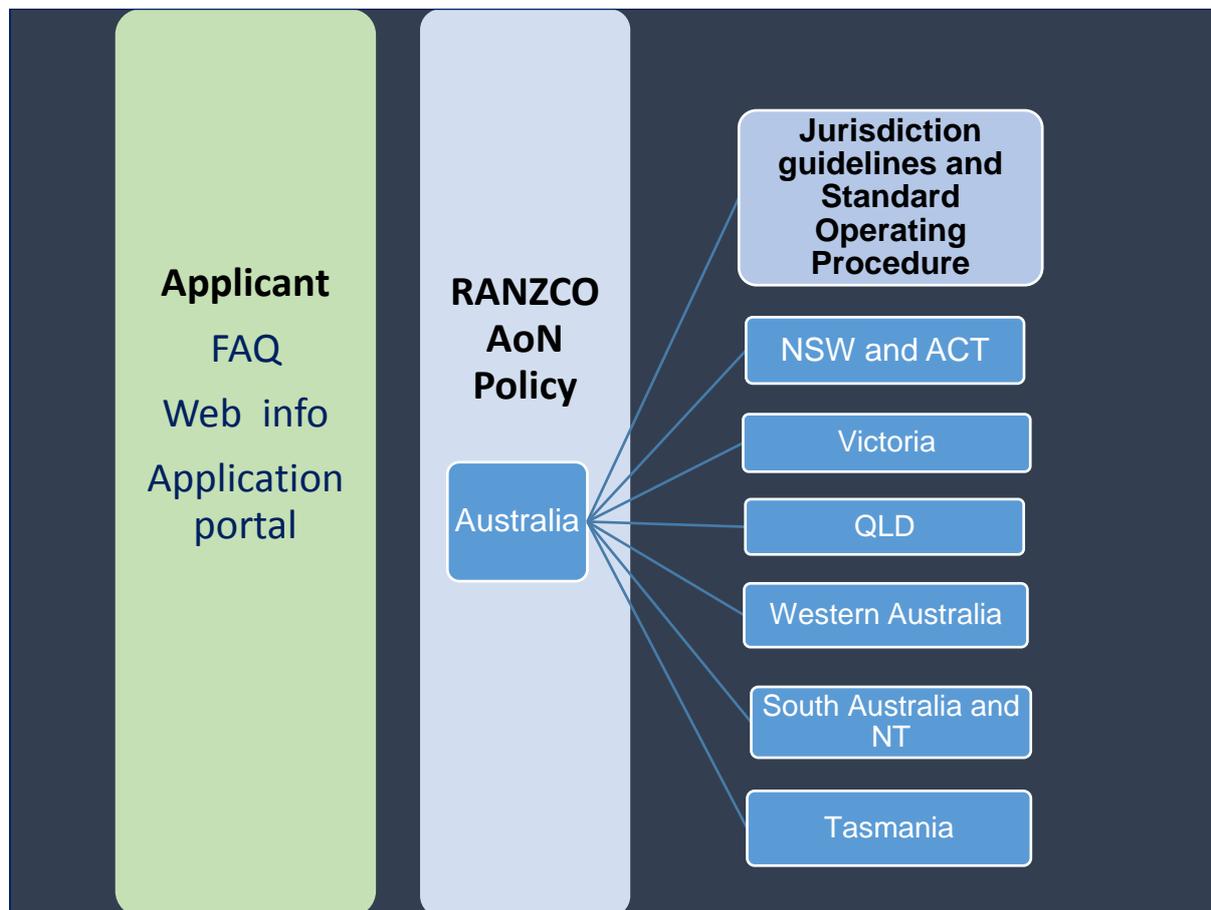
## PART A Purpose and scope

The purpose of Area of Need (AoN) locations in Australia is to address critical medical workforce shortages in designated areas that will result in improved patient access to services.

Specialist International Medical Graduates (S-IMGs) must apply to the Australian Health Practitioners Regulation Agency (AHPRA) for limited registration to temporarily practice in an AoN position under Section 67 of the Health Practitioner Regulation National Law (2010). Before the S-IMG can be considered eligible for limited registration by AHPRA, they must apply to the College and the S-IMG's prospective employer must apply to have the position declared an AoN.

This policy and standard operating procedure describes the RANZCO process for assessing AoN location applications by employers throughout Australia unless specified otherwise. The scope of the policy applies to both the public and private health sectors.

**Figure A.1: Outline of RANZCO AoN policy, procedures and applicant information.**



## **PART B      Glossary and Definitions**

<b>Definition</b>	<b>Description</b>
The College	Refers to the Royal Australian and New Zealand College of Ophthalmologists (RANZCO).
Applicant	Employer, and any other individuals or organisations seeking to obtain a RANZCO determination of AoN in Australia.
AHPRA	Australian Health Practitioner Regulation Agency.
Specialist International Medical Graduate (S-IMG)	A medical practitioner who has obtained a specialist medical qualification outside of an accredited Australian or New Zealand medical college which allows recognition as a specialist in their country of training.
Area of Need (AoN)	A declaration made by the relevant State or Territory Department of Health relating to a specific position (role vacancy) which lies within a geographical area in which the provision of a particular service is considered to be inadequate for the need. The purpose of this giving the employer the option of filling the position with an S-IMG.
Medicare Provider Number	Enables Medical Practitioners to participate in the Medicare Program and to provide a method of identifying the place from which a service was provided.
District of Workforce Shortage (DWS)	<p>AoN and DWS are two separate processes. Section 19AB of the Health Insurance Act 1973 (HIA 1973) restricts access to Medicare provider numbers, requiring IMGs to work in a DWS for a minimum period of ten years from the date of their first medical registration in Australia (referred to as the 10 year moratorium requirement), in order to access the MBS.</p> <p>DWS status is administered by the Australian Commonwealth Government and is linked to provisions in section 19AB of the HIA 1973, which is the mechanism enabling IMGs to access the Medicare Benefits Scheme (MBS).</p>

Definition	Description
Labour market testing	Advertisement period required by RANZCO as specified in Section G ( <a href="#">#Labour market testing</a> ).
Australian Statistical Geography Standard (ASGS)	The ASGS brings all the regions for which the ABS publishes statistics within the one framework and is used by the ABS for the collection and dissemination of geographically classified statistics.

## PART C Background

### 1. Specialist –pathway – AoN process

The Health Practitioner Regulation National Law came into effect on 1 July 2010. The Specialist pathway - AoN is for S-IMGs who are overseas-trained specialists applying for an AoN specialist level position in Australia. Section 67 of this legislation allows limited registration to be granted to enable S-IMGs to practise in an AoN.

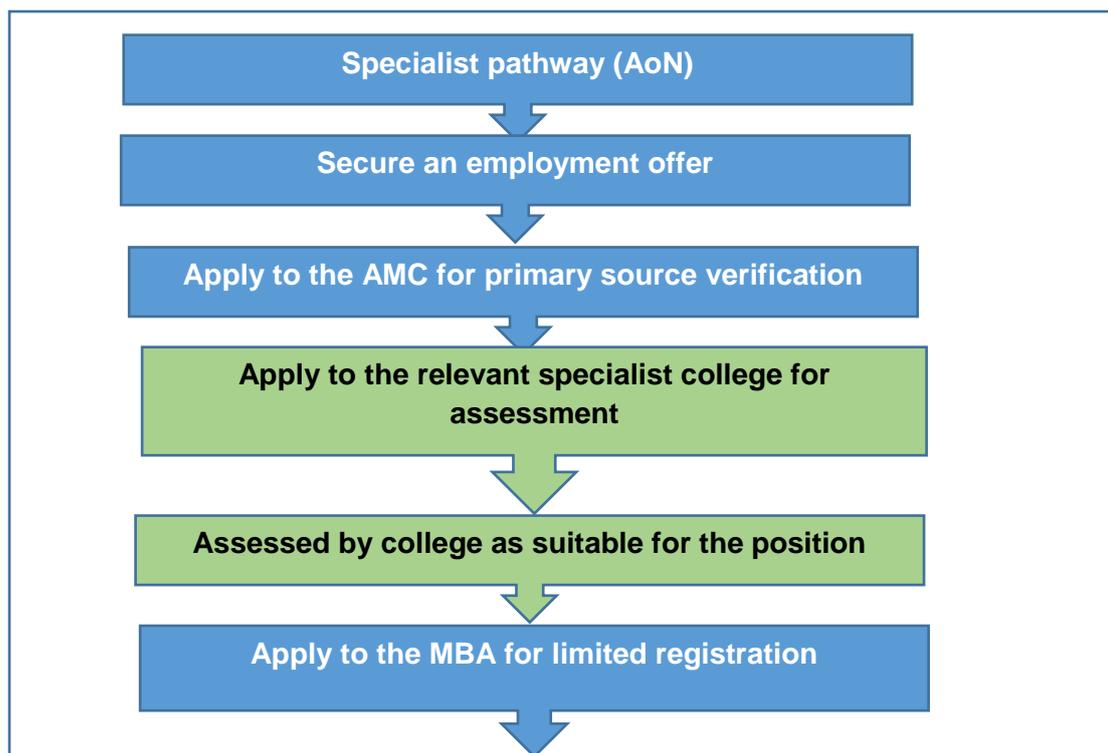
S-IMGs who are applying to the College for recognition of their specialist qualifications in Australia (Specialist Recognition assessment) may also apply for an assessment of their suitability for temporary practice in an AoN position, whilst undergoing Specialist Recognition assessment. If deemed AoN-suitable by the College an S-IMG may then apply to the Australian Health Practitioners Regulation Agency (AHPRA) for limited registration to practice in an AoN position. If at any time the S-IMG is found to be not satisfactorily progressing through the Specialist Recognition assessment process the College's recommendation for the S-IMG to practice in the AoN position will be removed.

The Medical Board of Australia is responsible for deciding whether an individual applicant is eligible, qualified and suitable for limited registration for an AoN, to practise in a particular position. On the basis of the application, the College's recommendation and any additional information requested, the Medical Board will decide whether an S-IMG has the necessary skills, training and experience to safely meet the particular need for health services in that position. This may include compliance with a supervision plan, a professional development plan, satisfactory performance and satisfactory progress towards gaining specialist registration.

This document outlines the policy for RANZCO assessment of AoN locations within Australia requested by service/organisation prior to the appointment of an S-IMG, as outlined in step 1 of the Specialist pathway - AoN process for S-IMGs determined by APHRA, refer to Figure 2.

Further information for S-IMGs applying to The Royal Australian and New Zealand College of Ophthalmologists (RANZCO) for Specialist Recognition assessment may be obtained at the following website location <https://ranzco.edu/education-and-training/specialist-international-medical-graduates> .

**Figure C.1:** Specialist pathway - AoN process for SIMGs (APHRA 2016)



## 2. AoN program Australia

The Health Practitioner Regulation National Law came into effect on 1 July 2010. Section 67 of this legislation allows limited registration to be granted to enable a health professional to practice in an AoN that is declared by the relevant State/Territory Minister. This section also prescribes that the function of determining an AoN is the role of the responsible Health Minister in each State/Territory and that the Minister may delegate this power to an appropriately qualified person, refer to Table 2.1.

**Table C.1:** AoN State and Territory Ministerial delegations of Authority

State and Territory	Delegated Authority
New South Wales	NSW Ministry of Health
Australian Capital Territory	The Deputy Director General, Strategy and Corporate
Queensland	Queensland Department of Health.
Victoria	Department of Health & Human Services
South Australia	South Australia Health, Chief Medical Officer
Northern Territory	Northern Territory Health, Chief Medical Officer
Western Australia	WA Department of Health
Tasmania	Department of Health and Human Services. Chief Medical Officer and Chief Health Officer.

### 3. AoN Validity

For the purpose of this guideline and standard operating procedure an AoN application can only be submitted by an employer for a vacant ophthalmologist position which cannot be filled through standard recruitment processes within Australia and New Zealand. AoN status can be obtained by both public and non-public health employers.

A position is not considered filled until a doctor is registered against that position by AHPRA. AoN status attaches to a specific position and is NOT transferrable to a substantially different position or location. Each declared AoN may be allocated to one individual S-IMG. An S-IMG cannot hold multiple AoN declarations at the same time.

### 4. AoN Operational Period

The AoN operation period varies across jurisdictions, refer to Table C.2 for details. The College will provide guidance to jurisdictional governments regarding an appropriate AoN operational period based on the geographical regions workforce requirements. Extensions will not be automatically granted and the College will be seeking the applicant to provide evidence that they have sought longer term workforce solutions in their extension applications.

**Table C.2:** AoN Operation periods outlined for the different States/Territories

State and Territory	Duration
New South Wales	Where approved, positions will be granted AoN status for a period of up to 3 years. Where a modification request only is approved, the approval period remains the same.
Australian Capital Territory	AoN status is initially granted for a 12 month period. Up to three, 12 month extensions may be granted. The AoN status will not be extended beyond 48 months.
Queensland	The operational period for a designated specialist AoN is four years. The operational period for a Junior Medical Officer is one year.
South Australia	Determinations for an AoN are granted for a maximum of 3 years. New applicants must be submitted beyond this period.
Northern Territory	An AoN position may be declared for a period of up to 4 years and an AoN certificate stating the details of the declaration will be issued by the CMO to the Employer Applicant. The declaration attaches to a specific position and is not transferrable. Extension can be sought for up to 4 years.
Tasmania	The maximum operational duration for any declared AoN is 3 years. Renewals can be sought for a further 3 year duration.

State and Territory	Duration
Victoria	Approval period – if approved, AoN endorsements are valid for 12 months.
Western Australia	AoN determinations are granted for one to five years by WA Health depending on the circumstances on which the determination is based.

## **PART D RANZCO Area of Need principles and assessment process**

### **1. RANZCO AoN principles**

The RANZCO assessment process for AoN applications should be managed in accordance with the principles of natural justice and procedural fairness ensuring high ethical standards are maintained.

#### **Decision making**

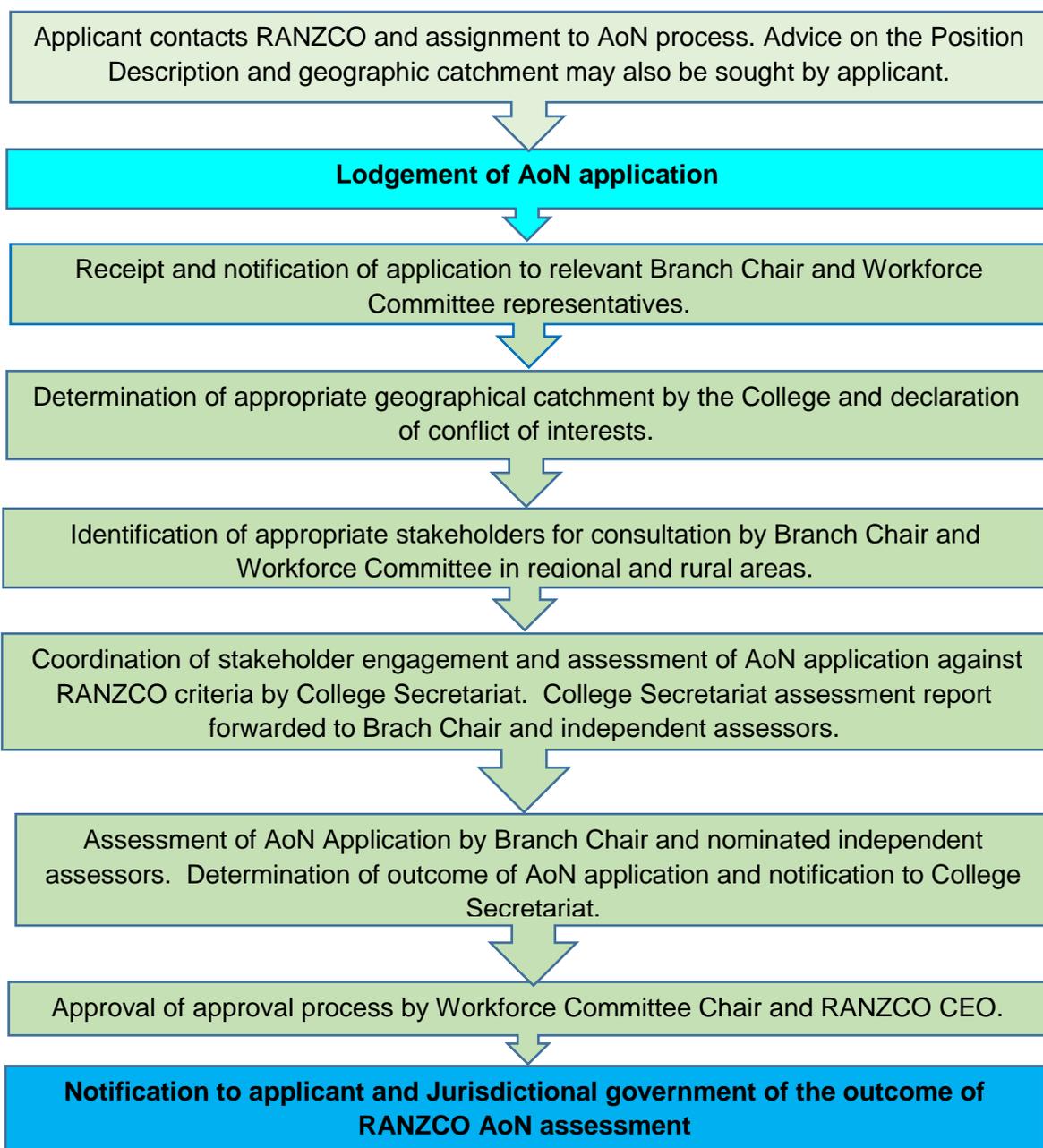
- The College promotes fair honourable and proper practice as outlined in the RANZCO constitution.
- The College AoN assessment decisions are transparent and capable of review by the Board.
- The College will consider both the public and private sector health workforce requirements.
- The College support for an AoN Declaration is dependent on an assigned geographic area with evidence of a critical ophthalmology workforce shortage. Short, medium and longer term ophthalmology health workforce planning requirements will be considered.
- The College support for an AoN Declaration is contingent on the assessment that ophthalmology services would fall below an acceptable level if the position vacant is not filled.
- The College support for an AoN designation is contingent on the applicant exploring alternative strategies available to provide ophthalmology services.
- College support for an AoN designation is contingent on the market being sufficiently tested (e.g. through national advertising) and no appropriately qualified and registered Australian or New Zealand Fellow has been identified for the position.

It should be noted that a 'practice in need' does not equate to an 'area of need'.

## Process requirements

- A genuine funded position should exist.
- Applications will only be considered via a formally documented process.
- All stakeholders participating in the AoN assessment process will declare potential conflicts of interest at the time of the application.
- An Area of Need Assessment fee is payable to the College upon application.
- Applications for an AoN determination are assessed by the College in a consistent, effective and efficient manner and will only be considered when all information has been submitted.
- Applications will be assessed against the College AoN assessment criteria.

## 2. RANZCO AoN assessment process



## PART E Requirements prior to AoN application

### 1. Initiation of contact with the College

Employers, and any other individuals or organisations seeking to obtain College support for an AoN in Australia, should contact the College well in advance of the application.

**Table E.1: AoN contact details**

Process	Department	Email address
AoN	Policy and Programs	<a href="mailto:ranzco@ranzco.edu">ranzco@ranzco.edu</a> attention Area of Need (Policy and Programs).

### 2. Position Description

College participation in the development of the position description is recommended by APHRA. The potential applicant is encouraged to seek assistance from RANZCO in preparing a detailed position description prior to labour market testing, if they consider an AoN application may occur at a subsequent date. The relevant State Branch Chair and one other designated member of the State Branch Executive will seek to be available to assess the appropriateness of the position description. Advice to the applicant will be coordinated and facilitated by the College Secretariat. RANZCO advice on the position description is expected to be available to the Applicant within a **two week timeframe**.

#### Position description

Applicants should seek to ensure the following information is included in the position description:

- The position title
- A comprehensive statement of duties
- Subspecialty interests and fellowship details
- Qualifications and experience—identifying and distinguishing between what selection criteria are regarded as 'essential' or 'desirable'; and clarifying whether candidates must show either that they have practical experience or that they have aptitude in a particular aspect of clinical practice.
- Special requirements of the position, which may be due to the geographic location or specific nature of the medical services to be provided.
- Requirements to supervise, manage and / or educate junior medical staff, medical trainees and / or other staff as appropriate.
- Working hours by practice location including after-hours roster responsibilities.
- Clinical practice privileges or appointments relating to the position
- Non clinical duties such as teaching and research.
- The remuneration package for the position, including whether the applicant will be providing services that need to attract Medicare rebates.

An example position description template is located on the WA Health Website at [Applying for an AoN determination](#).

### 3. Preliminary Labour Market Testing

Potential AoN applicants within regional and remote areas may contact the College Secretariat after 6 weeks of advertising in the RANZCO classifieds to facilitate broader communication within the State/Territory. The College Secretariat will notify the State Chair/Branch Executive and ask that direct communication regarding the position is circulated via usual Branch notifications (e.g. email).

### 4. AoN geographical catchment

The applicant is required to specify the designated geographical AoN catchment area based on their local knowledge. Provision of information regarding distances and travel times from major metropolitan areas is required. Potential AoN applicants that have extensively tested the market as outlined in Section 8 may contact the College Secretariat for advice on the appropriate geographical AoN catchment area prior to lodgement of the application. RANZCO advice on the appropriate geographical catchment is expected to be available to the Applicant within a two week timeframe.

## PART F The College AoN standard operating procedure summary

### 1. RANZCO role responsibilities

All stakeholders participating in the AoN assessment process will declare potential conflicts of interest at the time of the application. Refer to table F1.1, for the assigned roles and responsibilities in the RANZCO AoN assessment process.

**Table F 1.1: RANZCO AoN process roles and responsibilities**

<b>Roles</b>	<b>Responsibilities</b>
Workforce Committee Chair	Ensure the overall process is managed with procedural fairness and provide arbitration if required. Determine how conflict of interest declarations should be managed. Approve the final College AoN letter to the Applicant and the relevant State/Territory Health Authority.
RANZCO CEO	Ensure the overall process is managed with procedural fairness and provide arbitration if required. Approve the final College AoN letter to the Applicant and the relevant State/Territory Health Authority (following approval by the Workforce Committee Chair).

<b>Roles</b>	<b>Responsibilities</b>
RANZCO Branch Chair	Assess and make a determination for AoN applications within their Branch jurisdiction with an approach consistent with RANZCO policy and standard operating procedure. The RANZCO Branch Chair may also elect the assistance of an independent Fellow to also review the application. In the case of a declared conflict of interest the RANZCO Branch Chair must designate a member of the Branch Executive to assess the AoN application.
Branch Executive	Determine the appropriate geographic catchment for the AoN assessment. Support the RANZCO Branch chair to make a determination by providing relevant workforce information and stakeholder contacts. A nominated member of the Branch Executive must assess the AoN application and nominate an independent assessor, in the event the Branch Chair has a declared a material conflict interest.
Independent AoN Assessor	Confirm availability and assess the AoN application with an approach consistent with RANZCO policy and standard operating procedure as required.
State based Workforce Committee	Support the RANZCO Branch chair to make a determination by providing relevant workforce and regional information.
Workforce Committee Secretariat.	Coordinate the AoN application process, assess the completeness of the application, conduct relevant analyses, and advise the RANZCO Branch chair and Workforce Committee regarding the outcome of evidence of need assessment including the workforce statistical analysis.

## 2. RANZCO process timelines

The AoN assessment process may take from between five to six weeks from receipt of all required documentation. For full indicative timeline, refer to Table F 2.1.

**Table F 2.1: RANZCO AoN planned assessment process indicative timelines**

<b>Process Step</b>	<b>Description</b>	<b>Timeframe</b>
<b>1</b>	Applicant contacts RANZCO and assignment to AoN process and may seek advice on an appropriate position.	0
<b>2</b>	Receipt and notification of an AoN application to Branch Chair and Workforce Committee.	Within 2 working days of receipt
<b>3</b>	Determination of AoN geographical catchment by College. Assessment fee payable by applicant. Coordination of declarations of conflict of interest complete by College Secretariat.	1 week from receipt of application and upon payment of fee

Process Step	Description	Timeframe
4	Identification of appropriate stakeholders for consultation by Branch Chair and Workforce Committee. Consultation letter forwarded to relevant stakeholders.	1.5 weeks from receipt of application.
5	Completion of stakeholder consultation process and collection of local workforce information.	3.5 weeks from receipt of application
6	Final evidence of need assessment by College Secretariat forwarded to Branch Chair and Workforce Committee for review.	4 weeks from receipt of application.
7	AoN declaration recommendation completed by RANZCO Branch Chair and independent assessors. Coordination of final approvals by College Secretariat.	5 weeks from receipt of application.
8	The College Secretariat notifies the applicant and Workforce Committee of the outcome of the overall process in writing. A copy of the letter is forwarded State/Territory Health Authority by the College Secretariat as required. The Branch Chair may also elect to notify relevant stakeholders the outcome of the AoN assessment following notification to the applicant by contacting the College Secretariat.	6 weeks from receipt of application.

## PART G RANZCO assessment of AoN applications

### 1. Applicant process

At the time of applicant lodgement for the request of RANZCO AoN support, the final application and evidence of need information must be made available to RANZCO. The College will only accept complete applications for review, that only require RANZCO approval.

The jurisdictional government AoN forms require the applicant to provide; employer details, practice location, days of practice, number of full time equivalents (FTE) and/or part time equivalents. The College also requests the following additional practice information;

- Primary and all secondary locations owned by the applicant,
- Number of registrars,
- Training and research requirements,
- Subspecialty details,
- Locum and outreach services (including caseload),

- Total hours worked in the public sector by practice ophthalmologists,
- Public sector caseload,
- Patient wait lists for both the private and public sector.

## 2. RANZCO AoN assessment criteria

An employer or the employer's authorised agent must gain RANZCO support for an AoN declaration in Australia. This assessment criteria is applicable to new positions and to extension of previously approved positions. To meet the criteria for AoN, the application must include:

- Reason for the vacancy and exploration of alternative strategies
- Confirmation of District of Workforce Shortage
- Requested AoN duration period.
- Position details (attach a job description form);
- Evidence of labour market testing;
- A complete AoN application form;
- A complete Evidence of Need form; and
- Written confirmation of stakeholder support required by jurisdictional agencies and a letter of support from the secondary location where the employer differs from the primary location.

**A full description of what is required to meet the criteria for RANZCO AoN checklist is located in Appendix A.** The College will assess whether the application is complete based on the AoN criteria checklist located in Appendix A. RANZCO will not assess the application unless it is complete. The College Secretariat will notify the applicant if AoN application has been deemed to be incomplete or is not sufficient. The assessment process will cease by RANZCO at this time. It is the responsibility of the applicant to resubmit a complete AoN application to RANZCO.

## 3. District of Workforce Shortage (DWS)

All locations (including all secondary locations) must be located in a District of Workforce Shortage (DWS). DWS approval is required for S-IMGs to be considered under Section 19AB of the HIA 1973, to gain access to the Medicare Benefits Scheme. It is the responsibility of the applicant to ensure an application has been made to the Australian Commonwealth Government Department of Health and Ageing (DoHA) or the proposed location to be considered as a DWS for all non-public employers. The DoHA can be contacted at [19AB@health.gov.au](mailto:19AB@health.gov.au).

## 4. Reason for vacancy and exploration of alternative strategies

The Applicant should provide information to the College regarding the nature of the vacancy (i.e. why and how long has the position been a critical vacancy, number of vacant positions at level etc). Evidence must be provided that demonstrate that alternative strategies that are available to provide services (i.e. locums, secondment, outreach services, government incentives, services provided by other locations) have been explored and why these options were not considered suitable.

## 5. Requested AoN duration period and AoN private practice location by FTE

The Applicant is required to notify the College of the requested AoN duration period and outline reasons as to why this is considered appropriate. The College may recommend a different duration period to the relevant jurisdictional government in the event the AoN application is supported.

The Applicant is required to notify RANZCO of the requested AoN primary AoN practice location and all secondary practice locations. Information regarding the expected full time equivalent time (FTE) by clinical practice should be included in the application in circumstances whereby multiple practice locations apply, as outlined in Table G 5.1.

**Table G 5.1:** AoN private practice location by FTE

No	Practice name	Practice Location	AoN Position FTE
1			
2			
3			

## 6. Public Hospital RMO applications

Public hospital appointments must meet the relevant Public Sector Standards required by the relevant jurisdictional government. This minimum standard of merit, equity and probity is met for recruitment, selection and appointment if:

- a proper assessment matches a candidate's skills, knowledge and abilities with the work-related requirements of the job and the outcomes sought by the public sector body, which may include diversity; the process is open, competitive and free of bias, unlawful discrimination, nepotism or patronage; and
- Decisions are transparent and capable of review.

The Applicant must provide evidence to the College that the applying health service has been a participating hospital in the most recent Health centralised RMO recruitment process, or has requested access to the centralised RMO recruitment pool Public hospital RMO applications.

## 7. Labour market testing

AoN applications must provide documented evidence of labour market testing. All positions must have been advertised prior to applying for AoN to must be designed to attract a maximum response.

### Advertisement requirements

All applications need to provide documented evidence of labour market testing that demonstrate genuine attempts have been made to recruit to the position locally within the last 12 months. Market testing should not solely fall during the Christmas and New Year holidays. Advertising must take place both State-wide and nationally.

Advertisements must be consistent with the role description and the location of the position's employment. Advertisements calling for or referring to "Area of Need doctors" or "S-IMGs", or that limit the available pool of applicants in any way, are not considered adequate forms of labour market testing and will not satisfy this criterion. Ophthalmology positions that are initially advertised as requiring generalist skills and evolve to entail specific subspecialty fellowships will require the minimum advertisement period to recommence.

#### RANZCO Advertisement requirements

Evidence of 3 months advertising in the RANZCO classifieds must be provided within the last 12 months. The primary location of the position should be included in the advertisement header. The RANZCO required advertisement period of 3 months will recommence in the event that the primary location of the position changes during the recruitment process. All secondary practice locations must be specified within the advertisement.

#### Two additional appropriate advertising forums

Evidence of advertisement on two separate occasions, within the last 12 months, on two additional appropriate forums, which has proved unsuccessful, must be also be provided.

#### Documentation of advertisements

Documented evidence of the published advertisements must be provided by the applicant.

The Applicant must provide receipts of all the relevant advertisements and include details of closing dates of the advertisement as outlined in Table G 7.1.

**Table G 7.1:** AoN application documentation of advertising

No	Where advertised	Minimum advertisement period	Publication and closing dates of advertisement
	RANZCO College Classifieds	3 months	
		2 months	
		2 months	

## 8. Outcome of Advertising

Applicants are expected to demonstrate that advertising has failed to attract a suitably qualified Australian or New Zealand applicant.

The following information outlined in Table G 8.1 must be provided to the College.

**Table G 8.1:** AoN application outcome of advertising

<b>Outcome of Advertising</b>	
<i>Do not identify applicants by name.</i>	
<b>Specialist and Registrar Applications</b>	<b>RMO Applications</b>
Number of applicants who applied for position:  Australian or New Zealand-trained: _____ International Medical Graduate/s: _____	Number of applicants who applied for position through the RMO Centralised Recruitment Process: Australian or New Zealand-trained: _____ International Medical Graduate/s: _____
<b>Outcome of Interviews</b>	
Number of applicants interviewed for position: Australian or New Zealand-trained: _____ International Medical Graduate/s: _____  <i>Please confirm if any medical practitioners with general and/or specialist registration with the Medical Board of Australia (MBA) applied for the position. If they were not considered suitable for interview, please specify why in the adjoining column. If they were offered the position, and later withdrew their application evidence must be provided (i.e. email from the applicant). If S-IMGs were interviewed, please provide details in the adjoining column of what country they are currently residing in.</i>	Please provide any other relevant information regarding the interview process (if applicable):

RANZCO may determine that an advertisement does not demonstrate a genuine attempt to test the market. RANZCO may seek advice from relevant bodies to clarify attempts to test the market. Assurance that all suitable Australian and New Zealand trained applicants from the advertising campaigns were contacted and offered employment must also be provided by the applicant to the College.

## 9. Evidence of Need

The College support for an AoN Declaration is contingent on the assessment that ophthalmology services within a designated geographic area would fall below an acceptable level if the position vacant is not filled. An AoN determination is generally not declared to any practice located within inner metropolitan regions of Australia with sufficient practicing ophthalmologists to meet patient demands.

The applicant is required to specify the requested AoN geographical catchment area. Provision of information regarding distances and travel times from major metropolitan areas. The Branch Executive will be responsible for determining the appropriate geographic location for the AoN assessment because they have a perspective of the overall State/Territory workforce requirements. The College Secretariat will provide advice to the Branch Executive regarding the appropriate AoN geographical catchment area by considering health service

regions defined by jurisdictional governments including; Primary Health Care Networks, Local Government areas and Local Hospital Districts. The College Secretariat is also responsible for providing current ABS geographical information to the Branch Executive within a week of an AoN application to inform the appropriate geographical catchment for the AoN assessment. The State Branch Executive will also consider the advice from the Workforce Committee as required.

Australian Statistical Geography Standard (ASGS) including the remoteness category will also be considered in the College evidence of need assessment analysis. The College will seek to consider the eye health requirements for the population at the local level including the SA4, SA3 and SA2 level. Refer to the following table (G 9.1) as an example of the Australian Statistical Geography Standard (SA4, S3 and SA2).

**Table G. 9.1:** Australian Statistical Geographical Standard (ASGS)

SA4 code	SA4 name	SA3 code	SA3 name	SA2 code	SA2 name
509	Western Australia - Wheat Belt	50901	Albany	51225	Albany
					Albany Region

#### AoN assessment eye health population needs

The College AoN assessments for Australia will consider the historical and predicted future eye health population requirements for the assigned AoN assessment geography. Future eye patient demand modelling will be completed subject to the availability of reliable population projections at a local level. An epidemiological approach will also be adopted with the inclusion of appropriate eye health data sources where these may be available, including; Australian population based studies and Australian surveys. The College Secretariat will be responsible for the completion of the population based demand modelling based on advice received from the Workforce Committee and the RANZCO Branch Chair.

#### Patient access to services

Applicants must provide details to the College of the impact on service delivery if the position(s) is/are left unfilled.

The College AoN assessments for Australia will consider current access to services in both the public and private sectors and future population service delivery requirements. Access to public hospital and services within the inpatient and outpatient setting will be considered within the determined AoN geographical region, subject to the availability of service and hospital waiting list data. Additional service activity data in the private sector will be included in the assessment, subject to the availability of reliable data sources. Outreach services will also be considered in remote settings where applicable. The College Secretariat will be responsible for the completion of the service delivery modelling based on advice received from the Workforce Committee and available data sets.

## Ophthalmology workforce assessment

The State Branch Chair will assess the current and future workforce capacity to meet patient demand within the assigned AoN geographical region. The overall impact on service delivery if the position is left unfilled will be considered. The following statistics will be analysed by the College Secretariat to help assess whether a critical workforce shortage currently exists for ophthalmology or a specific subspecialty:

- Number of ophthalmologists per agreed Australian population ratio in metropolitan and non-metropolitan regions.
- Number of full time equivalent (FTE) ophthalmologists practicing per population ratio in the public and private sector based on clinical hours.
- The number of FTE Locum and outreach services.
- The number FTE ophthalmologists by subspecialty.
- Current vacancy rates.
- Public sector appointments.
- Number of registrars being trained with geographical region.
- Net supply changes including retirement's rates.
- Consideration of registrar supervision requirements and arrangements.
- The number and percentage of S-IMGs.

## **10. Stakeholder Consultation**

The applicant is required to provide RANZO with letters of support from the Executive Director of Medical Services (or equivalent) of the primary employing body, required letters of support from relevant jurisdictional government and a letter of support from the secondary location where the employer differs from the primary location. If the applicant is seeking approval for the provision of additional services/facilities on the AoN certificate where the applicant is NOT the employing body (for example, the provision of Visiting Medical Officer (VMO) services to a local hospital or aged care facility), additional stakeholder information needs to be provided. Original copies of the correspondence from stakeholders should be dated no later than 90 days prior to the date the application.

The College promotes fair honourable and proper practice as outlined in the RANZCO constitution. RANZCO will contact all neighbouring practices, public hospital staff and locums to provide feedback on the AoN Application within regional and remote areas. The College may also request further workforce information from stakeholders including the number of FTEs, locum hours and public hospital caseloads if deemed necessary. The College may determine that it is not necessary to seek additional stakeholder feedback in metropolitan areas (Remoteness Category Zone 1) or extensive feedback not feasible within the AoN assessment process timelines.

The Branch Chair will determine the appropriate stakeholders to consult and may seek guidance from the Workforce Committee members and the College Secretariat. The College may also directly consult with the Executive Director of Medical Services or the Country Health Service for the further information. The College Secretariat will provide a standard stakeholder letter as requested by the Branch Chair.

## **PART H RANZCO AoN determinations**

Applications for an AoN determination are assessed in a consistent, effective and efficient manner and will only be considered when all information has been submitted. RANZCO may contact the practice directly for further clarification regardless of whether an external agent has been used by the practice. Applicants will be notified the final outcome of the College AoN assessment by formal communication in writing. The correspondence will outline the reason for decisions.

All RANZCO criteria for the determination of an AoN must be met by the applying service/organisation for the College to support AoN application. Applications may be accepted, refused or referred back to applicants for clarification if it cannot be assessed against the agreed RANZCO criteria. The Branch Chair is responsible for making AoN determinations for their relevant jurisdiction. Two independent assessors will make a recommendation to the Workforce Committee Chair in the event of an identified conflict of interest by the Branch Chair. The Workforce Committee Chair and RANZCO CEO must approve that AoN application assessment process has adhered to the RANZCO policy and procedural guidelines prior to notification of outcome to the Applicant. The RANZCO CEO will sign the letters of communication to the Applicant and relevant Health Authorities. The College Secretariat will circulate the approved AoN determination letters to stakeholders with 2 business days. The College AoN process timelines and determinations will be recorded by the College Secretariat and made available to the Workforce Committee, Branch Chairs and the Board as required.

## **PART I RANZCO modifications and extensions**

### **1. Modifications**

Employer/authorised agents must submit an application to the College for endorsement of AoN modifications. The Applicant requesting the amendment must be from the same employer/authorised agent that requested the original AoN application. Information must be provided to the College regarding the extent of the requested modification and reasons for the change. Further information or supporting documentation (including, but not limited, to evidence of advertising and DWS status) may be required. Applicants should contact the College Secretariat as per Part E of this document ([Initiation of contact with the College](#)). If a modification request includes new locations (e.g. the practice opening up a sister service in a neighbouring suburb or an after-hours service), the applicant must provide supporting evidence to the College that a genuine evidence of need exists.

The College Secretariat will forward the modification AoN application to the Branch Chair and relevant Workforce Committee. The Branch Chair will determine the AoN modification process requirements, to allow for minor variations to be reviewed promptly. The Applicant will be advised by the College Secretariat of the expected process timelines following advice from the State Branch Chair.

## 2. Extensions

Once elapsed, if the employer wishes the AoN determination to continue so that S-IMGs can continue to be employed at that location, it is the responsibility of the service/organisation to submit a new AoN application to the College. An Extension Application Assessment fee will be payable to the College. The Applicant must submit an application to the College, a minimum of 120 days prior to the expiration of the AoN designation to allow sufficient time for the College to review the application and to meet jurisdictional government timelines (90 days). The RANZCO AoN policy and relevant jurisdictional AoN guidelines and standard operating procedure will apply for all AoN requested extensions. Extension Applications must provide evidence that longer term workforce solutions have been sought. RANZCO may seek to provide a maximum AoN time period.

## PART J References

**Table J.1: Jurisdictional Government AoN policy, procedures and forms**

State/Territory	Web Link 2016
QLD	<a href="https://www.health.qld.gov.au/aon/policyaon.asp">https://www.health.qld.gov.au/aon/policyaon.asp</a>
NSW	<a href="http://www0.health.nsw.gov.au/policies/pd/2013/PD2013_003.html">http://www0.health.nsw.gov.au/policies/pd/2013/PD2013_003.html</a>
ACT	<a href="http://www.health.act.gov.au/professionals/medical/area-need-policy-and-procedures">http://www.health.act.gov.au/professionals/medical/area-need-policy-and-procedures</a>
WA	<a href="http://ww2.health.wa.gov.au/Articles/A_E/Applying-for-an-area-of-need-determination">http://ww2.health.wa.gov.au/Articles/A_E/Applying-for-an-area-of-need-determination</a>
SA	<a href="http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/careers+at+sa+health/medical+-+public+and+private+sector+-+area+of+need#useful-forms">http://www.sahealth.sa.gov.au/wps/wcm/connect/public+content/sa+health+internet/careers+at+sa+health/medical+-+public+and+private+sector+-+area+of+need#useful-forms</a>
VIC	<a href="https://www2.health.vic.gov.au/health-workforce/working-in-health/international-health-professional-victoria/area-of-need-reqs-intl-medical-graduates">https://www2.health.vic.gov.au/health-workforce/working-in-health/international-health-professional-victoria/area-of-need-reqs-intl-medical-graduates</a>
Tas	<a href="http://www.dhhs.tas.gov.au/healthprofessionals/area_of_need_declaration">http://www.dhhs.tas.gov.au/healthprofessionals/area_of_need_declaration</a>
NT	<a href="http://www.health.nt.gov.au/For_Professionals/Area_of_Need_Declarations/index.aspx">http://www.health.nt.gov.au/For_Professionals/Area_of_Need_Declarations/index.aspx</a>

## PART K Record of Amendments

Page	Details of amendment	Date approved
Entire document	Created	7/5/2016
Title	Title changed from 'RANZCO Area of Need Policy and standard operating procedure' to 'Australia Area of Need Policy and standard operating procedure'	27/5/2017

## Appendix A RANZCO AoN assessment criteria checklist for applicants

AoN Applications must include documented evidence as outlined in the RANZCO AoN checklist.

Criteria	Check List
<b>Confirmation of District of Workforce shortage</b>	<input checked="" type="checkbox"/>
<b>Criteria</b>	
<b>1. Position Details</b>	
There must be an identified vacant position supported by a job description form.	<input checked="" type="checkbox"/>
Ensure that the job description form includes the working hours or full-time equivalence and salary of the position.	<input checked="" type="checkbox"/>
<b>2. Evidence of labour market testing</b>	
<b>Advertising must include the RANZCO classifieds.</b>	<input checked="" type="checkbox"/>
<b>Evidence of a minimum of 3 months of advertising, within the last 12 months in the RANZCO classifieds.</b>	
On three appropriate forums, which has proved unsuccessful, must be provided.	
<i>All advertisements must have been designed to attract maximum number of candidates prior to applying for AoN.</i>	
<b>Public hospital RMO applications:</b>	<input checked="" type="checkbox"/>
Evidence that the applying health service has been a participating hospital in the most recent Department centralised RMO recruitment process, or has requested access to the centralised RMO recruitment pool. If recruitment is taking place at a time that does not align with the centralised RMO recruitment process, the above advertising requirements apply.	
<b>3. Application letter</b>	
An AoN application form must be complete and duly signed by the Executive Director of Medical Services (or equivalent) of the primary employing body.	<input checked="" type="checkbox"/>
<b>4. Evidence of Need statement</b>	
An Evidence of Need statement must be submitted to outline the key factors of why an AoN determination is required. The Applicant must provide documentary evidence that the RANZCO evidence of need criteria has been met.	<input checked="" type="checkbox"/>

<b>5. Stakeholder support</b>	
A letter signed by the Executive Director of Medical Services (or equivalent) of the primary employing body	<input checked="" type="checkbox"/>
Rural Hospital Applications – a letter from the relevant Country Health Service	<input checked="" type="checkbox"/>
<b>Letter of Support from College</b>	<input type="checkbox"/>

AoN Applications will only be assessed once payment of assessment fee has been received.