

19 September 2011

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Dear Pauline-Jean

### **Proposed Changes to the Special Purpose (Locum Tenens) Scope of Practice**

Thank you for the opportunity to comment on this proposal. The proposed changes seem to us to be sensible. We do however, wish to make the following comments.

*Extend maximum period of time a doctor can be registered from six months to twelve months.*  
We agree with the extension of time proposed.

*Discontinue the practice of extending registration in a locum tenens scope of practice where the applicant has also applied for registration in a vocational scope of practice.*

We agree with paragraph two as it would seem the need to be given an extension should no longer be necessary.

*Implement a stand-down period of at least six months between consecutive locum tenens applications to discourage misuse of the pathway.*

We agree with the stand down period.

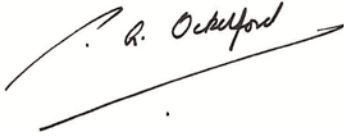
*Allow applications at all levels of employment rather than restricting applications to those IMGs working at consultant level.*

We are concerned by the proposal that this is to be extended to registrars and house officers as well. If this is to happen it will need to be monitored very, very carefully with approval for registrars granted by the BABs and very limited scopes of practice in the registration. We also think it would be impossible to assess an IMG for a locum house officer position that bypassed the current NZREX.

*Time spent on the revised locum tenens scope of practice not to count towards the period of supervised practice required whilst registered in a provisional scope of practice.*

While we support the proposed changes set out in paragraph five we wonder whether they are necessary given that no doctor will be able to spend more than 12 months as a locum and therefore the maximum period that could be counted toward the time would be those 12 months.

Yours sincerely

A handwritten signature in black ink, appearing to read "P. Ockelford", with a long horizontal stroke extending to the right below the name.

Dr Paul Ockelford  
NZMA Chair