

Document Number:

CRMEC Policy 11

Document Name:

Change of Circumstance

Scope

Prevocational education and training programs (ETPs) must comply with the *National Standards for Prevocational (PGY1 and PGY2) Training Programs and Terms* (the National Standards) and the national *Requirements for prevocational (PGY1 and PGY2) training programs and terms*. A change in the ETP or training term after accreditation has been granted introduces a risk of non-compliance and as such, requires approval from the Canberra Region Medical Education Council (CRMEC).

The scope of this policy is to define the different levels of change of circumstance, and the processes to ensure the accreditation status of a prevocational ETP or any specific training term is not jeopardised. This policy outlines the process for changes of circumstance in an ETP or training term that is already accredited by the CRMEC. Processes for attaining accreditation of a full ETP or a training term that is not currently accredited by the CRMEC are outlined in *CRMEC Policy 09: Accrediting a Full Facility* and *CRMEC Policy 10: Accrediting New Training Terms*.

Notification of Proposed Change to Education Training Program or Training Term

CRMEC should be notified of all intended changes to an accredited ETP or training term. Changes may be minor or major. In general, determination of a minor versus major change of circumstance is made based on the potential change in training experience, workload, supervision or safety and welfare. *Table 1* provides examples of minor versus major changes of circumstance; however, these are examples only and each change to the overall ETP or individual training terms should be independently evaluated. If health service representatives are unsure whether a proposed change of circumstance constitutes a major or minor change, contact the CRMEC Director for advice. If the situation is unclear, be cautious and submit the proposed change for review and approval by the CRMEC Accreditation Committee.

Table 1: Examples of changes to an ETP or training term

MAJOR Changes of Circumstance Notification and CRMEC Approval Required	MINOR Changes of Circumstance Notification Only
<ul style="list-style-type: none"> • Change to the structure of the ETP (e.g., major change to the structure of the oversight committee [PETC/GCTC]) • Delivering a training term from a new/changed satellite site • Change to the classification of a training term (i.e., change to the clinical experience category) • Change a training term from PGY2-only status to include PGY1 • Change to the number of prevocational junior doctor positions in the training term • Merging of two or more accredited training terms to create a new training term • Change to a supervisor with a different employment status at the facility (i.e. VMO versus 	<ul style="list-style-type: none"> • Change to the Director of Prevocational Education and Training (DPET) or the nominated accreditation representative • Change in term supervisor or clinical educators in the term, where the employment status of the new supervisor is not different, and the proposed new supervisor has completed prevocational supervisor training • Change to the clinical team structure (e.g., team based versus ward-based) • Change to rostering where there is no major change in weekly hours or to the pattern of after-hours rostering • Minor change to term objectives where the change remains clearly within the scope of the term

MAJOR Changes of Circumstance Notification and CRMEC Approval Required	MINOR Changes of Circumstance Notification Only
fulltime) <ul style="list-style-type: none"> • Increase in overtime hours (rostered or unrostered) • Addition of after-hours work or change in after-hours work pattern • Major change to the term objectives or clinical responsibilities/tasks 	<ul style="list-style-type: none"> • Minor change to responsibilities where the change remains within the scope of a prevocational doctors' level of training • Updated term description following a review that required no substantial changes (i.e. new signature and review date)

Minor changes to an education training program or training term

Minor changes of circumstance are those that are unlikely to have an impact on the prevocational junior doctor's experience, workload, supervision or safety and welfare and do not impact significant classifications of the training term (i.e., the clinical experience and potential status as a service term). Minor changes of circumstance could arise from routine reviews of the term description by the oversight committee (e.g., Prevocational Education and Training Committee [PETC] or General Clinical Training Committee [GCTC]), changes to the DPET or supervisor or minor adjustments to the rostering pattern in a term.

The CRMEC should be informed of minor changes to the ETP or a training term as soon as possible. The following documentation is required for a minor change of circumstance for an ETP or training term:

- New term description
- Term Description Update Template
- For minor change to ETP as a whole: letter/email confirming the minor change of circumstance.

Major changes to an education training program to a training term

Major changes of circumstance are changes that have the potential to have an impact on the prevocational junior doctor's experience, workload, supervision or safety and welfare, or changes that could influence the oversight of the ETP, the classification of a training experience or the status of a training term (e.g., as a service term). Where training terms are removed or changed between accreditation visits, health services must ensure that the balance of training experiences across the overall ETP is maintained.

Major changes to an ETP or training term should be notified to the CRMEC for approval before implementation. Prevocational doctors cannot be allocated to or work in an unaccredited ETP or training term. Changes of circumstance are only accredited when the health service has received written confirmation from the CRMEC. The following documentation is required:

- Change of Circumstance Form
- New term description
- Term Description Update Template
- For major change to ETP as a whole: letter confirming the major change of circumstance.
- Any supporting documentation specific to the request.

Approving a Change of Circumstance

Minor changes to and ETP or training term usually require no additional information before being accepted by the CRMEC Director. Major changes of circumstance must be reviewed and approved by the CRMEC Accreditation Committee. The CRMEC Accreditation Committee considers:

- Compliance with the National Standards and requirements for prevocational training terms in the National Framework,
- Classification of the training experience, team structure and status as a service term,

- Scope of work and its contribution to education and training,
- Supervisory model, including the term supervisor’s training and experience,
- Impact on patient welfare and safety, prevocational doctor welfare and safety and cultural safety.

The CRMEC Accreditation Committee refers its recommendations on the following changes of circumstance to the Council for consideration and endorsement:

- New training terms,
- Changes that are potentially non-compliant with National Standards,
- Changes deemed to potentially impact patient welfare and safety, prevocational doctor welfare and safety and cultural safety.

Time frame for approval of a change of circumstance

A change of circumstance may lead CRMEC to request further documentation/evidence and/or may require review by multiple CRMEC committees. **Allow three months for approval of a change of circumstance.**

However, the CRMEC acknowledge that at times a change of circumstance may be required within a short timeframe to accommodate changing prevocational junior doctor numbers (e.g., at the commencement of the training year). If an urgent change of circumstance is required, the health service representatives should contact the CRMEC Director and indicate the reason for urgency. In urgent situations where there is a low risk, the CRMEC Accreditation Committee Chair and/or the CRMEC Chair can consider changes of circumstances out-of-session to fast-track approval.

Possible outcomes from a request for change of circumstance

The CRMEC Accreditation Committee may:

- Request additional information or documentation,
- Request a meeting with key personnel in the facility,
- Determine that a site visit is necessary.

Depending on the CRMEC’s final decision, the change of circumstance may lead to a training term and/or the health service’s ETP as a whole:

- Retaining its original accreditation status,
- Being provisionally accredited (i.e., the health service ETP/training term some provisos to meet),
- Having no changes approved.

In general, if a change of circumstance is approved the CRMEC will raise provisos requiring the change to be formally evaluated and reported to the CRMEC within a specified period. The potential outcomes after submitting a proviso are outlined in *CRMEC Policy 18: Proviso Reporting*.

Related Policies and Relevant Guidance

- Australian Medical Council: *National Standards for Prevocational (PGY1 and PGY2) Training Programs and Terms*
- Australian Medical Council: *Requirements for prevocational (PGY1 and PGY2) training programs and terms*
- CRMEC Policy 09: Accrediting a Full Facility
- CRMEC Policy 10: Accrediting New Training Terms
- CRMEC Policy 18: Proviso Reporting

Version Control

Review date	Version	Updated by	Approved by	Changes made
Nov 2014	1.0	Director	CRMEC	
Feb 2015	1.1	Director	CRMEC	
Feb 2016	2.0	Director	Not required	Formatting
Aug 2017	2.1	Admin	Director	Formatting
Aug 2020	2.2	Manager	Accreditation Chair	Added table 1, Added approving a change of circumstance, removed flowchart that previously covered information in approving a change.
Feb 2023	2.3	Admin	Director	Formatting
Nov 2023	3.0	Director	Accreditation Committee Chair	Updated to reflect new National Framework. Removed "Notification of other key changes" and incorporated this material into Table 1. Added related policies and guidance.