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25 October 2019

Dr Michele Bruniges AM
Secretary
Commonwealth Department of Education
GPO Box 9880
Canberra ACT 2601

By e-mail: CGS@education.gov.au

Dear Dr Bruniges,

Discussion Paper – redistribution pool of medical places, September 2019

Thank you for the opportunity to submit comments on the issues and policy options raised in the Discussion Paper.

We have kept our feedback brief, as we have had the opportunity to discuss with Deputy Secretary David Learmonth our participation in the Murray-Darling Medical Schools Network (MDMSN) and our related request for exemption from the proposed redistribution of medical Commonwealth Supported Places (CSPs). This discussion took place in Canberra on 3 May 2019. Our comments on the Discussion Paper should be read in conjunction with the briefing material we provided for that meeting.

Summary

We recommend that the Sydney Medical Program is granted an exemption from the proposed reallocation of medical CSPs for the following reasons:

- our commitment to shift 24 commencing CSPs in 2021 from Sydney to Dubbo as part of the MDMSN already represents a large (11%) reduction in the CSP allocation for the Sydney Medical Program;
- this commitment was made during negotiations with the Commonwealth Department of Health about the MDMSN. At the Department's request, these negotiations took place in haste during late preparations for the 2018 Federal Budget; and
- we made it clear throughout those discussions that our participation in the MDMSN would depend on the resolution of a number of issues, including the application of any medical CSP redistribution policy to the University.

If an exemption is not possible for the University of Sydney, we recommend that the first redistribution process is applied to deliver only the 32 commencing CSPs required to allow Charles Sturt University (CSU) and Western Sydney University (WSU) to establish the Orange node of the MDMSN.

We further recommend that the Government defer any plans to establish the cyclical redistribution pool process beyond 2021, to allow time to evaluate the effectiveness of the initial redistribution in delivering the Government's medical workforce policy goals.

If the Government determines that the first redistribution will proceed and include 60 CSPs, then **Option 3** in the Discussion Paper is preferred.



Background

We have delivered an acclaimed medical program for over 130 years. Since 1997 this has been a four-year graduate-entry program and since 2014 we have offered a Doctor of Medicine (MD) degree. Our current allocation is an average of 227 CSPs in each commencing cohort.

We have a deep and longstanding commitment to rural medical education and rural health professional education more broadly, supported generously by the Commonwealth Government for decades under what is now known as the Rural Health Multidisciplinary Training (RHMT) Program.

Our regional, rural and remote health education footprint currently includes facilities in Orange, Dubbo, Broken Hill and Lismore and their satellite towns. We have more than 130 academic and professional staff based at these sites, along with 100 affiliated academic title holders and 70 paid tutors. Almost 1,000 medical students have completed an extended rural placement at one of our sites. Our tracking of graduate destinations demonstrates that our approach is highly effective in producing medical professionals more likely to pursue careers in regional, rural and remote communities.

In 2018 we were awarded funding under the MDMSN to develop our School of Rural Health – Dubbo site into a full four-year end-to-end medical program. Our Dubbo expansion will represent one of five small medical programs making up the MDMSN. The Dubbo program will take its first cohort of 24 students in 2021, utilising 24 CSPs from the University's existing allocation of medical CSPs, leaving the Sydney Medical Program with an average of 203 CSPs per cohort.

Our commitment to shift 24 commencing medical CSPs from Sydney to Dubbo (96 in total by 2024) represents a large (11%) reduction in our allocation. The reallocation of 2.03% of CSPs suggested in the Discussion Paper would lead to a further cyclical erosion of four or five CSPs, depending on whether the 2.03% is applied to our total current allocation of 227 CSPs or to the new net figure of 203 CSPs after we shift 24 CSPs permanently to Dubbo from 2021.

Feedback on options

For the reasons outlined above we believe exempting the Sydney Medical Program from the redistribution process is fair and warranted. However, if an exemption is not possible, we recommend that the first redistribution process is applied to deliver only the 32 commencing CSPs required to allow CSU and WSU to establish the Orange node of the MDMSN. We further recommend that the Government defer any plans to run the cyclical redistribution pool process beyond 2021 to allow time for evaluation and further consultation.

If the first redistribution pool process proceeds in 2021 covering the proposed 60 CSPs, of the three options outlined in the Discussion Paper, **Option 3** is the most compatible with our situation. We recognise, however, that Option 3 would not be acceptable to the majority of Australian universities, as most do not have a commitment to deliver full end-to-end regional medical programs by 2021. We do not wish to undermine other medical schools with which we have collegial relationships and historical ties.

In our assessment, the application of the Assessment Framework for **Option 1** will be exceedingly complex, and the cost of administering it – both to the Government and to individual medical schools – may well exceed any benefits that might flow from it. If the Government is committed to the reallocation pool, **Option 2** is the most likely to be acceptable to the majority of Australian medical schools, although further information will be required on the intended method of calculating institutions' proportion of regional medical course load.



THE UNIVERSITY OF
SYDNEY

I would be pleased to discuss our position further with you. In the interim, if the Department needs clarification of any of the points that I have made in this letter, please contact Mr Tim Payne, Director, Higher Education Policy and Projects in my office: 02 9351 4750, tim.payne@sydney.edu.au.

Yours sincerely

(Signature removed)

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cc.

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