Author’s response to reviews

Title: Cambodia's health professionals and the ASEAN Mutual Recognition Arrangements: Registration, education and mobility

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Version: 1 Date: 22 Oct 2018

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We would like to thank all reviewers for their helpful comments, and in particular for correction of any errors. We have substantially revised the paper in response to their input.

Reviewer 1

Add a footnote to explain the numbers preceding quotes from informants starting on page 8 in the Results section We have incorporated a statement into the methods that covers this: “Informants’ interview transcripts were de-identified and allocated codes, used in this paper to track quotations (#001–#16). Further identification—by discipline, employer, gender or ethnic group—risks confidentiality of informants.”

Reviewer 2

It would be good if this manuscript could describe more on what extent for other countries in ASEAN, particularly in Myanmar, Lao PDR and Vietnam, move on MRAs - by literature review: We have recently published a scoping review of this field and have added a sentence to the introduction drawing attention to this and the limited country data available:

“A recent scoping review of the MRAs in health provides broad insight into their implementation, though there is limited documentation of country experience available. [5]”

Reviewer 3

The use of the term "registration" with "and regulation" in the title and throughout the document is erroneous and requires amendment for clarity… This is important when identifying the three key themes - is it Registration or Regulation as the first theme? We have considered this and reference to registration is probably sufficient for the purposes of this paper.

The use of the term "professional training" in the text rather than "professional education" creates further confusion and needs to align with the use of "education" in the title: To minimize this confusion we have changed training to education in all cases except in key informant quotations.

The statement "recent legislation makes registration compulsory for the three professions" is incorrect. Registration has always been compulsory under both the previous and the new law. It is the enforcement through fines and/or imprisonment that is now in the new law to ensure all practicing health professionals hold "initial registration as a health professional" and "a renewable licence to practice as a health practitioner". We have altered this sentence on page 2 to read more accurately: “Recent legislation provides for enforcement through fines and/or imprisonment to ensure all practicing health professionals hold initial registration as a health professional and a renewable licence to practice as a health practitioner". This is consistent with the MRA guidelines, though the capacity for enforcement appears limited.” Thank you for this wording.

It notes dentistry and nursing introduced continuing professional development initiatives as a positive reinforcer for registration. However, it omits the fact that the Medical Council of Cambodia (MCC) initiated this approach and that the Dental Council and Nurses Council subsequently adopted the MCC approach: We did not wish to ignore the MCC introduction of CPD but wished to be consistent with the data provided by informants on the strategic use of CPD made by Dental and Nursing Councils (page 2): “The Medical Council of Cambodia (MCC) has initiated continuing professional development, and more recently the Dental and Nursing Councils have also introduced continuing professional development initiatives, using them strategically as a positive reinforcer of registration.”

The statement regarding education courses being longer than regional counterparts is not well explained. A mandatory Foundation Year for all health professional students is included in each health profession course and these topics are not profession specific making a four year Bachelor
degree in Nursing actually a 3 year degree. This could be further explained at Page 11, Line 38.

We have added comment on the Foundation year on page 12: “A shared mandatory Foundation Year for all health professional students seeks to redress uneven secondary schooling, and establish a common platform for the health workforce, but lengthens overall course length.” We have amended the statement on Nursing: “Nursing faces particular issues in complying with the MRAs. With the additional mandatory Foundation Year, the four year degree course is effectively three years—a year less than the ASEAN four year degree standard.”

The government of Cambodia is known as the Royal Government of Cambodia (RGC): This has been changed in the abstract.

Page 8, Line 49-59 is incorrect. Regulation of health profession education through accreditation of public and private education providers and approval of pre-service (undergraduate) curricula for doctors, dentists and nurses is the shared responsibility of the Ministry of Education, Youth And Sport (MoEYS) and the Ministry of Health. The five health profession Councils - Medical Council of Cambodia (MCC); Dental Council of Cambodia (DCC); Cambodian Midwives Council (CMC); Cambodian Council of Nurses (CCN); and Pharmacy Council of Cambodia (PCC) do not have legislative authority regarding health profession education development and approval. The new law on Regulation of Health Practitioners (Nov 2016) provides for Councils to set the Scope of Practice for each health profession and establish the competencies required of new graduates but does not give the authority to approve pre-service (undergraduate) curricula. Each Councils’ involvement is at the discretion of MoEYS and MoH: Thank you for this correction. We have corrected this: “With the universities—including the flagship University of Health Sciences—now accountable to the Ministry of Education, Youth and Sport (MoEYS), and the introduction of the new law on Regulation of Health Practitioners in late 2016, responsibility for registration is a shared responsibility between MoEYS and MoH. The five professional councils set the Scope of Practice for their profession, and propose competencies for graduates: Medical Council of Cambodia (MCC); Dental Council of Cambodia (DCC); Cambodian Midwives Council (CMC); Cambodian Council of Nurses (CCN); and Pharmacy Council of Cambodia (PCC) [13].”

Page 9, Line 17-29 states midwifery is subsumed in the nursing agreement. However, it is not explained that Cambodia is distinctly different in that it recognizes Nursing and Midwifery as two separate health professions like some other countries with discrete pre-service education and two separate regulatory Councils (CMC and CCN). Midwifery is not a subset of the Nursing Profession. We have changed the statement to ”The MRAs currently include medicine, dentistry and nursing: there is no separate MRA for midwifery.”
On page 14 we have changed the paragraph to read: “Faced with the challenges of high maternal and neonatal mortality, Cambodia has launched a package of successful interventions, [17] among them the introduction of the Associate Degree in Midwifery, with a degree program in preparation [6]. However, in contrast to other ASEAN states where nursing includes midwifery, in Cambodia Midwifery and Nursing have discrete pre-service education and two separate professional Councils”

Page 10, Line 7 -37 connects CPD as an incentive for registration which historically was the case under the previous law. However, under the new Law it is now an essential criteria for demonstrating continuing competence as a health practitioner and renewal of license to practice. We have clarified our statement to point out the requirement for CPD as well as its use as an incentive on page 10: “Continuing Professional Development (CPD) is a requirement for ongoing license renewal for all health professionals, but is being used by both medicine and dentistry as an incentive for promoting registration to existing practitioners.”

Page 12, Line 7-8 - recommend an alternate word be chosen for "anxious" when applied to the Ministry of Health (MoH) This has been replaced by “concerned”

Page 14, Line 17-25- I am unsure if this statement is correct and believe the source (002#) should be checked. It states [Midwives] are the weakest of all professions ...... and not on the radar for health donors and yet midwives are well supported in Cambodia through donor funded maternal and child health programs e.g. USAID, UNFPA, Marie Stopes, GIZ, WHO etc. I believe this statement more accurately reflects the position of Nurses not Midwives in Cambodia. The source is a senior consultant in the area but we appreciate that the quote may not be helpful. We have deleted this quote.

Page 17, Line 1 - May be helpful to explain in the article and the conclusion the impact of unreliable institutional assessments relates not only to the health profession courses but also to the standard of secondary education in Cambodia. The line has been changed to “entrance and exit examinations have been introduced because of inconsistencies in secondary schooling and unreliable institutional assessments”.

Page 17, Line 60 - Suggest inclusion of five health profession Councils names - Medical Council of Cambodia (MCC); Dental Council of Cambodia (DCC); Cambodian Midwives
Council (CMC); Cambodian Council of Nurses (CCN); and Pharmacy Council of Cambodia (PCC). These have been added to the list of abbreviations.

Page 18, Line 5 - The Nursing and Midwifery Education Society is identified, described and listed but not the other professional associations for medicine, dental and nursing. This has been deleted.

Page 19, Line 15 - Suggest Peter Miller's title be included in the Acknowledgement - The Human Resource for Health Consultant for the Office of the Representative of WHO, Cambodia. Thank you. This has been added.

1st column, 4th row - Technical School of Health Care should be Technical School of Medical Care (TSMC)
3rd column, 1st row - Cambodian Health Profession Councils
2nd row - Medical Council of Cambodia should read Medical Council of Cambodia - National as opposed to Regional MCC and Provincial MCC
3rd column, 5th row - Nursing Council of Cambodia should read Cambodian Council of Nurses - National
5th row - Midwifery Council of Cambodia should read Cambodian Midwives Council - National
3rd column, 6th row - National should be added to PCC and DCC.
3rd column, 7th and 8th rows - should include the abbreviations for each of the five health profession Councils in order of their establishment - MCC, DCC, CMC, CCN and PCC. Thank you for your attention to this detail. Table 1 has been corrected.

Figure 1. Thematic Map for analysis

Theme 1 Health Professionals Regulatory Framework does not provide clarity. I believe it would be better for the Theme 1 title to be Health Professions' Regulatory Framework than Health Professionals' Regulatory Framework and the map re-engineered to reflect the following.

The entities with the legislative power and authority for health professions' regulation or regulators should be clearly identified i.e EDUCATION ACCREDITATION & CURRICULA APPROVAL- MoEYS & MoH (mechanism is the ACC); REGULATION OF HEALTH PROFESSIONALS - MCC, DCC, CMC, CCN, PCC
(mechanism is registration, licence to practice; professional codes and standards; scope of practice, investigation of complaints with protective or disciplinary sanctions; monitoring and compliance.

Local and foreign health professionals; professional associations and NMESC are not legal entities for regulation. They are stakeholders of the regulators and advocates for the profession.

These were developed from the thematic analysis of the interviews to structure our analysis but we agree that the restructuring is more informative for those seeking to understand the regulatory structures themselves. We have made changes to respond to your suggestions, but have attempted to preserve the structure of the analysis.

Theme 2 needs to be further refined to focus on Accreditation of Education Providers - public and private and Approval of pre-service curricula for the National Exit Exam and subsequent registration by each health profession Councils.

There is duplication of boxed titles - Institutions x 2; Curriculum x 2  Box titles have been adjusted to reflect these suggestions.

Theme 3 - Mobility of Health Professionals Should “Student movement" actually be "Graduate movement or registered and licensed health practitioner movement?  This refers to student exchanges and placements and the language has been changed to reflect this