

26 April 2023

Dear Board

Consultation on the Recognition of Genetic Pathology

Thank you for consulting with Public Pathology Australia (PPA) regarding the application by the Royal College of Pathologists of Australia (RCPA) for Genetic Pathology to be recognised as a new field of specialty practice under the Health Practitioner Regulation (the application under National Law). We provide the following comments.

Background

PPA has 17 members spanning all jurisdictions in Australia. PPA members are major employers of pathologists in Australia. PPA members provide Genetic Pathology services. For more about PPA, go to www.publicpathology.org.au.

Key Issues

1. Regulatory action would assist in the recognition of Genetic Pathology as a field of specialty practice.
2. Additional possible positive consequences of recognising Genetic Pathology as a field of specialty practice are outlined in our response to point 4.
3. The potentially negative consequences of recognising Genetic Pathology as a field of specialty practice are outlined in our response to point 4.
4. There are specific issues that should be the focus of the AMC's assessment of the proposal.

Over the last few years the RCPA has tried to create a training pathway for this new specialty that has been heavily influenced by Clinical Geneticists. However, molecular techniques have been adopted across various disciplines of pathology and new developments are happening in different disciplines.

To understand the background of this new specialty properly one should go back to the development of molecular biology and new methods of analysis that provide additional information about disease. The techniques of molecular biology have exploded in the last 20 years and are increasingly utilised in a wide variety of clinical situations. Some examples include:

- I) rapid genomic analysis and diagnosis of newborn babies in intensive care units;
- II) prenatal screening of babies for inherited disease;
- III) accurate detection and description of mutations in tumours that allow better and more accurate treatment;
- IV) detection of minimal residual disease, where minute amounts of circulating DNA are detected in patients that are clinically in remission;

- V) identification of specific abnormalities in drug metabolism allowing better dosing in patients affected; and
- VI) the gut microbiome with the identification of multiple species of microbiological bacteria that determine the risk of association with clinical disease and metabolic state that are currently being investigated.

The development of the specialty of Genetic Pathology has been heavily influenced by the clinical specialty of Genetics, which deal with inherited diseases caused by DNA abnormalities. However, in clinical practice, a number of existing subspecialties in pathology have had practitioners with specific interest and expertise that have brought this field forward. For example, specific abnormalities in tumour pathology have been championed by Australian Anatomical Pathologists with a strong interest in tumour pathology. Prenatal testing has been developed by Chemical Pathologists out of Hong Kong, who were originally trained in Oxford and Australia and used PhD and postdoctoral studies to develop the technology. Minimal residual disease detection has been championed and developed by laboratory Haematologists with specific interests in leukemias.

In the longer term most of the diagnostic subspecialties in pathology will be utilising technologies that are currently proposed to be restricted to Genetic Pathologists. Therefore, there needs to be easily achievable upgrade pathways from multiple pathology specialties that allow the achievement of the relevant qualifications so they can report in their field of subspecialty rather than limit them to low complexity testing in molecular areas.

Some currently qualified Genetic Pathologists, lacking the subspecialty experience of the area (i.e. Somatic Tumour genetics, Leukemia diagnostics) sometimes misinterpret mutations found in the sample.

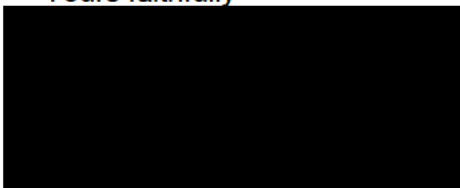
In the longer term, new trainees in most pathology subspecialties will need to develop a strong understanding of different technologies in the molecular field and have training in this area as well.

- 5. We have not been able to identify any impacts for patients and consumers, particularly vulnerable members of the community, that have not been considered in the application.
- 6. We have not been able to identify any impacts for Aboriginal and Torres Strait Islander People that have not been considered in the application.
- 7. Relevant stakeholder groups have been identified.
- 8. The interactions between Genetic Pathologists and other medical and health practitioners may improve if Genetic Pathology is recognised as a medical specialty if these specialists have an appropriate scope of practice that is more widely known and sought by referring health practitioners. This may lead to better requesting practice and greater understanding of genetic tests.

- 9.1 The recognition of Genetic Pathology may impact on the balance of the workforce to undertake genetic testing as outlined in our response to point 4.
- 9.2 The recognition of Genetic Pathology may reduce unnecessary fragmentation of health care knowledge and skills as outlined in our response to point 8.
- 9.3 The recognition of Genetic Pathology will impact on unnecessary deskilling or restrictions in the scope of practice of other practitioners as outlined in our response to point 4.
- 9.4 The recognition of Genetic Pathology will probably not introduce flexibility in the deployment of the medical workforce. However, it should assist in meeting the demand for Genetic Services which is growing rapidly. To accommodate an increase in the number of Genetic Pathologists required, additional training positions will need to be made available. The Commonwealth Specialist Training Program (STP) does not facilitate the training of Genetic Pathologists. STP trainees must be located in rural public hospitals however genomic services are centralised in metropolitan areas. There must be a change in the Commonwealth STP funding parameters and support from State/Territory Governments for additional training positions to meet demand for Genetic Pathologists.
- 9.5 The recognition of Genetic Pathology may not impact the volume of genetic testing as this area of pathology is increasing exponentially irrespective of recognition.

We invite your office to reach out to us should you wish to discuss our submission further.

Yours faithfully



Dr Petra Derrington
President