

3 July 2024

Dear Medical Board

### **Public Consultation on the revised Registration standard: specialist registration**

Public Pathology Australia appreciates the opportunity to comment on the draft revised *Registration standard: specialist registration* (the standard) and provides the following feedback.

#### **Background**

Public Pathology Australia (PPA) is the peak body for government owned and operated pathology services across Australia. PPA has 17 members across all jurisdictions in Australia. PPA members provide the vast majority of pathology services in Australia's public hospitals, service a number of private hospitals and operate community based collection services for patients. In addition to providing critical diagnostic pathology services, PPA members provide clinical services, teaching, training, research and stewardship of the public health system. PPA members are a major employer of pathologists, with over 900 pathologists employed in public pathology services across Australia.

PPA understands that the standard enables an additional, expedited registration pathway for Specialist International Medical Graduates (SIMGs). This aims to speed up the registration process for SIMGs with specialist qualifications by enabling them to directly apply for specialist registration without the need for a Medical College assessment. PPA understands that SIMG applicants will be required to undertake a period of supervised practice in the speciality and complete a comprehensive orientation to the Australian healthcare system prior to registration under the expedited pathway.

#### **Key Issues**

There are critical shortages of pathologists globally. Whilst Australia has more pathologists than many other countries, there are recognised pathologist shortages in Australia in (but not limited to) the disciplines of Genomics, Immunology and Chemical Pathology. These shortages are expected to be exacerbated in the future with increasing pathology activity driven by factors such as the ageing population, consumer expectations and changes in technology such as personalised medicine.

PPA acknowledges that the current SIMG assessment process is slow and involves numerous professional bodies. In pathology, the Royal College of Pathologists of Australasia (RCPA) has an essential role in evaluating pathologists with overseas qualifications.

There is a significant degree of variation amongst qualifications and training standards in different countries and between some Colleges within the same country overseas. As such, RCPA should retain oversight of the assessment process for pathologists but the exhaustive process for those from appropriate reciprocal countries should be improved via an expedited process. A one-off paper based assessment process would not be adequate in enabling an assessment of qualitative, behavioural measures.

The standard must require the SIMG to be assessed as competent once they have completed the period of supervised practice. The duration of the supervised practice should be clearly stated in the standard. The Specialist register should indicate whether the SIMG has completed the required period of supervised practice, or if not, the duration remaining to be completed, otherwise employers would find it difficult to know what if any supervision needs to be provided for a specific practitioner.

In terms of recognition of substantively equivalent qualifications from other countries, the RCPA is best placed to determine which countries have qualifications and training requirements for pathologists that are most similar to Australia. The list of approved qualifications or ones considered "substantially equivalent" should be accessible via a direct URL link in the standard, rather than just the generic "medicalboard.gov.au". As the list of "substantially equivalent" qualifications is specialty-specific, there must be direct input from the Medical Colleges with determinations conducted in a consistent, rigorous way that assures suitability and safety of practice in Australia.

The Medical Board should advocate for reciprocal recognition of Australian specialist qualifications by overseas health practitioner regulators.

Given workforce shortages in parts of the country, areas of need should be factored into the assessment process in the standard. SIMGs could be allocated a temporary role in these areas supported by connected mentoring and supervision with a longer term pathway to receive full recognition in the future.

In addition, there needs to be a balancing of social responsibility with respect to countries with significant workforce shortages against the right of the individual to pursue professional opportunities in their country of choice.

Thank you for the opportunity to comment on the standard. We can be contacted on the details below for further feedback. PPA looks forward to hearing about the outcome of consultation on the standard.

Yours sincerely



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CEO