



Australian Salaried Medical Officers' Federation

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## Medical Board of Australia

Australian Medical Council

AHPRA

Via: [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

Friday, April 28, 2023

### **MBA Public consultation: Proposal to recognise Genetic pathology as a new field of specialty practice**

The Australian Salaried Medical Officers Federation (ASMOF) is the Doctors Union. In 2023, we represent over 17,000 Registered Medical Practitioners including Staff Specialists, Post Graduate Fellows, Clinical Academics, Career Medical Officers, and Doctors in Training, including interns, Resident Medical Officers, and Registrars. Our members are directly employed by the Public Hospital System, Affiliated Health Facilities, Private Hospitals and in community health.

ASMOF welcomes the opportunity to provide feedback to the Medical Board of Australia ('MBA') on the application made by the Royal College of Pathologists of Australasia (RCPA) to have Genetic Pathology recognised as a new field of specialty practice within the specialty of Pathology, under the Health Practitioner Regulation National Law ('National Law').

As such, ASMOF supports, in principle, the application made by the RCPA for the formal recognition of genetic pathology as a new field of specialty practice in pathology.

The need for specialist recognition is best summarised by the fact that the field of study is practically distinct from other preexisting specialties. Like most medical sciences there is an expected level of overlap with other disciplines (i.e., genetic science) however the very nature of genetic pathology is extensive as it encompasses all testing for inherited and acquired changes to human DNA that affect human health.

Moreover, Genetic pathology is characterised by a range of unique factors and expertise which delineate the study and field of practice from existing disciplines. For example:

- Genetic pathologists are clearly in a class of their own when compared to clinical geneticists, genetic counsellors, and other health professionals who work primarily in direct patient care settings.
- Genetic pathology requires a highly developed level of expertise in relation to genetic and genomic testing. And,
- Genetic Pathologists are distinguished from clinical scientists by their primary orientation as doctors towards understanding and promoting the relevance of clinical testing to patient care.

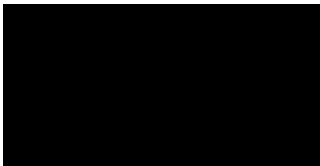
Finally, the increase of the genetic pathology workforce is becoming ever more important and urgent with the growing uptake of precision medicine, and the associated tools which need to be used in a rigorously quality-assured and clinically relevant way.

As the College outlined in the 2022 proposal, genetic pathologists already constitute a body of highly skilled specialist pathologists with an outstanding track record of clinical service and research ([RCPA, 2022](#)).

As such, the College already has long-established infrastructure for the specialty, including robust training, assessment and continuing professional development programs. These programs have been in place for the last 20 years and are supported by the governance and infrastructure of the RCPA.

For these reasons, ASMOF support, in principle, the application made by the Royal College of Pathologists of Australia for Genetic Pathology to be recognised as a new field of specialty practice under the Health Practitioner Regulation National Law.

Sincerely,



**Dr Antony Sara,**  
Federal President  
Australian Salaried Medical Officers Federation