

17February 2009

Specialist Arrangements
Attention: Practitioner Regulation Subcommittee

nraip@dhs.vic.gov.au

Dear Sir/Madam,

Re: Consultation Paper – National Registration and Accreditation Scheme for Health Professions

Thank you for inviting the Royal College of Pathologists of Australasia to comment on this Consultation Paper.

The College supports the proposed addition to 3.4.3 and 10.3.1.

The College has major concerns over the proposed addition of Reg I under 7.1 –

“It is proposed that boards must consider applications for registration from practitioners seeking to work in an area of need identified by a State or Territory government, where the applicant is not eligible for registration in any other category of registration. This provision will apply to all regulated professions. It is further proposed that boards may develop professional standards in respect of the registration requirements to apply to area of need registration to support a nationally consistent approach.”

It would be a serious concern from the point of view of public safety if a Medical Board was compelled to consider an applicant for registration in an Area of Need if they did not fall within any other category of registration.

Further the College considers there needs to be a requirement for any International Medical Graduate to be considered for registration they must have undergone an assessment process approved by the accrediting body ie in the case of medicine, the AMC. It would also be appropriate to mention the important role that the medical Colleges play in this process.

The College also has concerns over the Public Interest Category in the Limited Registration Category as there is potential that this provision could be misused.

The College finds the details in the draft document in some areas to be very confusing, particularly in the section on “Continuing Corporate and/or Continuing Professional Development Requirements”.

In a previous submission to the National Registration and Accreditation Scheme the College has expressed the view that the use of the word competence in this circumstance is not appropriate. All medical colleges have existing standards for participating in Continuing Professional Development Programs and there are also standards in the AMC accreditation process for Medical Colleges requiring them to have continuing professional development programs. However these standards are for continuing professional development and are not competency standards. Competency standards are totally different and approaches to measuring competency are totally different to those for Continuing Professional Development. The terminology appears to have been used incorrectly and requires amendment before any legislation is introduced.

Further, Clause b) suggests that the minimum standard would be the “same across all specialist medical colleges”. In practical terms, the College is unsure how this can be applied. There are points/diary based systems – eg like the RCPA, through to other Colleges with much more rigid requirements – possibly up to recertification/examination etc.

In relation to protection of specialist titles, there needs to be a provision made to prevent an AON registrant from calling themselves specialists as in many cases they will not hold the appropriate qualifications.

Finally, it should be compulsory for all AON registrations to have a time period status.

Yours sincerely,



Dr Debra Graves
Chief Executive Officer