

29 October 2008

Ms Bronwyn Nardi
Chair
Practitioner Regulation Subcommittee
of the Health Workforce Principal Committee

Attention: Practitioner Regulation Subcommittee

nraip@dhs.vic.gov.au

Dear Ms Nardi,

Re: Registration Arrangements Submission

Thank you for asking The Royal College of Pathologists of Australasia to comment on the above consultation paper.

In response to Options provided the College would like to advise the following.

**Proposal 4.3.1
Criminal History Checks**

The College favours option 3.

**Proposal 5.2
Qualifications and Registration**

Please note that the current terminology used by the Medical College and AMC is “substantially comparable” not “substantially equivalent”. This needs to be changed.

It is assumed that existing arrangements will continue with the Medical Board seeking advice from the relevant Medical Colleges re suitability of qualifications using the new agreed process?

**Proposal 6.2.1
Who makes registration decisions?**

The College is strongly opposed to the proposal that the Chair of the National Medical Board may not need to be a Registered Medication Practitioner. The College also considers that there should be a requirement for at least 50% of the members be Medical Practitioners (consistent with the provision of the National Board).

**Proposal 7.3
Non-practising registration**

The College prefers the original option.

**Proposal 7.4.1
Student registration**

The College would prefer Option 2.

Proposal 9.2
Continuing Competence Requirements

The use of the word “competence” is of serious concern. The need for demonstrated Continuing Professional Development is appropriate but the use of competence in this setting is a much more difficult phenomenon.

Proposal 10.1 and 10.3
Specialist and other endorsements on registration

If a National Board decides to create a new specialty or sub-group of practitioners which has the potential to impact on the scope of practice of practitioners registered by other Boards, these proposals must be submitted to the other relevant boards to allow advice to be provided to the Ministerial Council prior to any decisions being made.

Yours sincerely,



Dr Debra Graves
Chief Executive Officer