

24 May 2016

Executive Officer, Medical
AHPRA
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Email: medboardconsultation@ahpra.gov.au

Dear Executive Officer

RE: Consultation on draft revised registration standard for specialist registration

The Royal College of Pathologists of Australasia (the College) has two concerns in relation to the current registration standard for specialist practice.

Firstly, there does not seem to be a provision to monitor the compulsory Medical Board of Australia (MBA) requirements if specialists have more than one Fellowship. The College offers dual training with the Royal Australasian College of Physicians in Haematology, Immunopathology, Microbiology/Infectious Disease, Chemical Pathology/Endocrine, Genetics/Clinical Genetics and as such many of the Fellows also have an FRACP as well as FRCPA.

When specialists register there does not appear to be a requirement to demonstrate recency of practice and participation in CPD etc for both Fellowships. If a specialist is only working and participating in CPD in one area of specialist recognition, then the MBA requirement for the other qualification may not be met and may carry risks in relation to public health and safety.

The second issue is the concern many medical colleges have relating to the fact that the Medical Board of Australia recognises the specialist qualifications given by the Colleges without a requirement for being a Fellow. If the first issue was addressed, the College would not be so concerned about the second.

Thus, we do have some concern with the proposed changes.

Yours sincerely



Dr Debra Graves
Chief Executive Officer