

8 June 2023

Attn: Jason McDonald  
First Assistant Secretary, Regulatory Reform Division  
Australian Government Department of Finance

Via email: [HealthRegReview@finance.gov](mailto:HealthRegReview@finance.gov)

Dear Jason

### **Re Independent Review of Overseas Trained Health Practitioner Regulatory Settings**

Thank you for asking the Royal College of Pathologists of Australasia to provide comments on the above review.

The Royal College of Pathologists of Australasia (the College) is the leading organisation in Australia with respect to training and education, professional standards and quality in pathology and laboratory medicine.

The College welcomes the review and considers many of the recommendations to have merit, however, has serious concerns over recommendation F5:

*“The assessments of equivalence for specialist international medical graduates (SIMGs) to be transitioned from the specialist medical colleges to the AMC. The MBA, Ahpra and the AMC should determine the transition path and timeline in consultation with the specialist colleges, given their ongoing advisory role”.*

By way of background, there is a serious shortage of Pathologists in Australia and internationally. The College actively lobbies for additional training places in pathology with State, Territory and Federal governments to allow home grown pathologists to be trained which is important when the shortage is international. That said the College acknowledges that overseas qualified Pathologists can and do greatly assist with our workforce crisis and we support our Fellows and their laboratories in recruiting Pathologists from overseas.

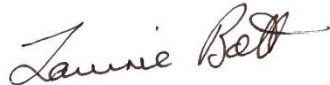
As such the College is actively involved in assessing specialist international medical graduated (SIMGs) in Pathology and have been doing so for many years. The College has developed systems to undertake these assessments as efficiently and effectively as possible and strives to provide appropriate information to the AMC and the MBA in a timely manner. The College takes this responsibility seriously so as to ensure that any SIMG who applies for registration in Australia has the appropriate qualifications and experience to practice pathology in Australia at a level that ensures Australians receive safe and appropriate quality pathology services.

Inappropriately qualified Pathologists will make errors and with the nature of Pathology results, these errors often cause significant patient harm with inappropriate management or death.

This assessment process of SIMGs is highly detailed, practical and needs assessors with experience. It is not a simple, routine or inconsequential process in many cases and Pathologists are the only people with the qualifications and experience to assess whether SIMG's qualifications and experience are of a standard acceptable to how pathology is practiced in Australia. The College is uncertain as to who at the AMC would be able to undertake these assessments? There are certainly some qualifications which are well known to the College and their assessments could be fast tracked, and indeed often are already.

The College already works very closely with the AMC and is more than happy to continue to do so and also look to any further streamlining of our processes that could be done to speed up the assessments, but we would strongly recommend that the College retains the responsibility for SIMG assessments to ensure patient safety for Australian needing Pathology.

Sincerely,



Dr Lawrie Bott  
**President**