



12 May 2023

Medical Board of Australia

By Email: medboardconsultation@ahpra.gov.au

Re: Proposal to recognise Genetic Pathology as a new field of specialty practice

Many thanks for providing us with the opportunity to provide feedback on the application by the Royal College of Pathologists of Australasia to have Genetic Pathology recognized as a new field of specialty practice within the specialty of Pathology, under the Health Practitioner Regulation National Law (the National Law).

ACRRM's vision is *the right doctors, in the right places, with the right skills, providing rural and remote people with excellent health care*. The College's Fellowship training, CPD and associated programs are specifically designed to provide Fellows with the extended skills required to deliver the highest quality Rural Generalist scope of practice. Rural Generalist practice is a general practice model of care with a practice scope designed to maximise the breadth of services doctors can provide to the people in their communities.

Nearly all ACRRM Fellows live in rural and remote areas, and they are a vital part of the continuum of care for the people living in these areas. These doctors are the country's pre-eminent experts in providing comprehensive care in isolated and low resource settings. They work under unique circumstances and with a scope of practice and working environment which can be very different to urban practice. These doctors are often the only readily available healthcare practitioners in an area, and as such, they may need to take on a range of roles which would ordinarily fall to specialists in larger areas.

Our members report that genetic pathology, particularly genomics, is rapidly becoming a substantial part of their everyday practice as General Practitioners working in rural and remote areas, and they have an important role in genetic testing in prenatal (e.g. non-invasive prenatal screening, preconception carrier screening), cancer, and other areas (e.g. future pharmacogenomics, direct to consumer genomics, polygenic risks); and referring patients for genetic services to inform diagnosis. Genetic health information and genomic mainstreaming (i.e. non-genetics healthcare professionals undertaking genetics/genomics) are increasingly important as genomics and precision medicine inform routine clinical care¹.

Accordingly, genomics is as an area under consideration for greater emphasis in our College's training programs, and educational activities and it is an area that will be given particular consideration in the College's forthcoming Rural Generalist Fellowship Curriculum review cycle.

Rural Generalist practice capability and capacity in genomics is an important preventive medicine, which may otherwise be unavailable to people in rural and remote areas, who have limited access to consultant specialist face to face services. In addition, many of our Fellows have built specialised expertise in this field which supports the feasibility of accessing these important services for the people in their local area.

To meet community needs, Rural Generalists are specifically trained and assessed to work in rural and remote, low resource environments and provide a scope of practice which extends beyond office based general practice to emergency care and to areas or secondary and other advanced specialised care.

¹ White S, Jacobs C, Phillips J. Mainstreaming genetics and genomics: a systematic review of the barriers and facilitators for nurses and physicians in secondary and tertiary care. *Genet Med*. 2020;22(7):1149-1155. doi:10.1038/s41436-020-0785-6 <https://pubmed.ncbi.nlm.nih.gov/32313152/>



Collaborative healthcare team models are a cornerstone of this framework and can assist in facilitating access to specialist medical services across Australia.

The complementary role of the Rural Generalist's expanded scope of practice allows them to provide some of the services associated with the proposed specialty, and as such it has a critical role in providing health care in rural, remote, and Aboriginal and Torres Strait Islander communities that do not have the benefit of locally based specialists.

It is therefore imperative that Colleges such as RCPA continue to work with ACRRM to ensure the training, skills, and capacity of Rural Generalists in providing genetic pathology services is recognised and facilitated. Sustainable, high functioning and reflexive multidisciplinary teams form when team members work effectively across their broadest scope of practice, skills and experience and are drawn together as a team with common purpose, governance structures and goals.

It should be acknowledged that the consultant specialist model with a dependence on specialist support staff teams and resources, and which relies on a certain volume of patients within a relatively narrow range of service needs, may not be a viable or effective model of care for many small, remote communities. In these cases, alternative collaborative models that leverage in-situ Rural Generalist doctors and health care teams can often offer the best possible care to these communities.

We would see the establishment of protected title of the specialist field of genomics as a positive step in so far as it will provide a spur to building a professional body of knowledge and skills focussed on this area of growing importance to medicine.

The contribution of this expertise to patient and community well-being, however, will to a large extent be dependent on the capacity of the doctors at the primary care interface to incorporate this learning into their practice. This is especially important in rural and remote areas that are geographically distant from highly specialised services and resources.

For these reasons we consider that any recognition of this specialist field should engender a responsibility to the profession within the recognised specialist field to upskill the primary care workforce and support development of models such as point of care testing which can lend feasibility to accessing the benefits of their expertise, particularly for patients in rural and remote areas. Supporting Rural Generalist doctors to gain advanced expertise in this area should be recognised as an important approach.

As you will be aware our College with the RACGP is well advanced in its application to have Rural Generalist Medicine recognised as a specialised field of practice for General Practice doctors. Our College is hopeful that this will be attained in 2023. These developments are associated with the National Rural Generalist Pathway concept which is identified as an action for implementation in the National Medical Workforce Strategy. This is overseen by the National Rural Generalist Strategic Council which includes a Jurisdiction Implementation subcommittee and includes the network of state and territory government funded Rural Generalist training coordination units in every jurisdiction. Further information and updates on this process are provided on our [website](#).

Yours sincerely



Marita Cowie AM
Chief Executive Officer