

26 April 2023

Dr Anne Tonkin AO
Chair
Medical Board of Australia
GPO Box 9958
MELBOURNE VIC 3001

Dear Dr Tonkin

RE: Support for Proposal for the recognition of Genetic pathology as a new field of specialty practice

Australian Pathology is the peak body representing 95% of the private pathology providers in Australia. Our members include national companies such as Australian Clinical Labs, Healius and Sonic Healthcare, small boutique laboratories such as Histopath, and several IVF providers, such as Genea, Monash IVF and Virtus.

We provide 90% of all pathology services in the Community and private hospitals and are exclusive providers under contract to a range of public hospitals and the National Defence services.

99.7% of out of hospital pathology services are bulk billed, higher than any other specialty. We provide national screening programs such as the cervical cancer screening program for HPV testing, and the National Bowel Cancer Screening program.

Australian Pathology note the public consultation for recognition of a new field of specialty practice: Genetic Pathology. In discussion with our members Australian Pathology is fully supportive of option 1 proposed as part of the public consultation. It is the view of our members that Genetic Pathology is an increasingly important part of Pathology and the broader medical system and as such requires appropriate accreditation and regulation. Having the speciality group recognised will increase workforce visibility, credential education pathways and drive innovation in precision and personalised medicine.

Please see attached for responses to specific questions, should you have any questions please contact Director of Policy, [REDACTED] or [REDACTED].

Yours sincerely



Liesel Wett OAM
Chief Executive Officer

Attachment A – Response to Consultation Questions

General questions

1. Has the claim that regulatory action is necessary to recognise genetic pathology as a field of specialty practice been substantiated?

Yes, Australian Pathology agrees there is a requirement for regulatory action to recognise pathology as a field of speciality. Genetic Pathology and Genomics are playing an ever increasing role in the delivery of quality pathology services and is key in supporting the delivery of precision and personalised medicine.

2. Have the positive consequences of recognition of Genetic Pathology as a field of specialty practice under the National Law been stated? Are there additional positive consequences that should be considered?

Australian Pathology agrees with the positive consequences outlined, having an accredited and registered workforce will have positive benefits for both workforce and patient groups.

3. Have the potentially negative consequences of recognition of Genetic Pathology as a field of specialty practice under the National Law been stated? Are there additional negative consequences that should be considered?

Australian Pathology note there are negligible negative consequences.

4. Are there specific issues that should be the focus of the AMC assessment of the proposal?

Recognition of genetic pathology will improve awareness of the discipline, which in turn will help to attract more trainees and support the creation of roles and positions for genetic pathologists that take best advantage of the expertise they have to offer. Genetic pathologists have unique skills and insights that add to the quality and safety of pathology in Australia. Collaboration with pathologist and non-pathologist colleagues leads to upskilling of other health professionals and enhanced medical care, particularly in personalised medicine. Not to mention, genetic pathologists are a regulated requirement for the clinical governance of genomic testing (NATA/NPAAC), reinforcing the importance of addressing limited workforce.

5. Are there any impacts for patients and consumers, particularly vulnerable members of the community, that have not been considered in the application for the recognition of Genetic Pathology as a new field of specialty practice?

Australian Pathology foresees nil negative impacts for patients and consumers, including vulnerable members of the community. Positive impacts would include easier access to precision medicine which would have a positive impact on vulnerable groups.

6. Are there any impacts for Aboriginal and Torres Strait Islander People that have not been considered in the application for the recognition of Genetic Pathology as a new field of specialty practice?

Australian Pathology foresees nil negative impacts for Aboriginal and Torres Strait Islander People. Positive impacts would include easier access to precision medicine which would have a positive impact on these patient groups.

7. Are there specific stakeholder groups that should be consulted further as the proposal is assessed and what would that add to understanding of the proposal? (please see Attachment B for the stakeholder groups for this consultation)

Australian Pathology has no further comments on this question.

8. What are the interactions now between genetic pathologists and other medical and health practitioners? How are these likely to change if Genetic Pathology is recognised as a medical speciality?

Pathology as a craft group is collegiate and collaborative and there is no anticipation that having Genetic Pathology recognised as a medical speciality will change this. Recognition will allow cross skilling of pathology and non-pathology colleagues and will become more relevant as genetic testing, precision and personalised medicine becomes the norm in coming years. Building a pipeline of skills and recognised workforce is critically important as medical care evolves.

9. Your views on how the recognition of Genetic Pathology will impact on the following:

- **Balance of the workforce to undertake genetic testing**

Australian Pathology does not perceive a significant impact on the balance of the workforce. This is an administrative change that will enable medical practitioners with the RCPA qualification in Genetic Pathology to have Genetic Pathology added to their record on the Register of Specialists.

It should be noted however, that as this is an increasing area of practice, Australian Pathology seek support from Governments to assist with attraction, training and retention of skilled Genetic Pathologists (and aligned healthcare professionals) to support Australia's current and future needs. Personalised and precision medicine is only set to grow and as such we need a suitably skilled and credentialed workforce to support the Australian community's evolving healthcare requirements.

- **Unnecessary fragmentation of health care knowledge and skills**

Genetics and Genomics are specialised areas requiring specialist training and education, it is therefore important to recognise Genetic Pathology as a specialist group. This will enable more training and education and

- **Unnecessary deskilling or restrictions in the scope of practice of other practitioners**

If Genetic Pathology was recognised as a field of speciality practice it would provide pathways for practitioners to be formally acknowledged for their skills and expertise. It may also have a positive affect on the number of practitioners who seek further training in this speciality field.

- **Flexibility in the deployment of the pathology, other medical and health workforce**

Recognition will enable education providers with appropriate programs of study to seek accreditation of their programs. Training of medical scientists, registrars and other elements of the pathology workforce will continue as will the commitment to information sharing the collegiate approach of the profession.

- **Provision of care and increase and/or decrease in the volume of genetic testing**

Australian Pathology agree with the RCPA that "approval of Genetic Pathology for the purposes of specialist registration will ensure visibility of the current workforce and may incentivise more medical practitioners to take up training in Genetic Pathology. Overseas specialists with comparable qualifications will also be able to be registered as specialists in this field. Specialist recognition will ensure patients have timely access to a qualified workforce."

Recognition will allow referring doctors and patients have timely access to appropriately credentialled and qualified practitioners.