

3 July 2024

By email: [SIMGPathwaysReview@ahpra.gov.au](mailto:SIMGPathwaysReview@ahpra.gov.au)

To whom it may concern

**Re: Public consultation on the revised Registration standard: specialist registration**

Thank you for the opportunity to respond to this public consultation on the draft revised specialist registration standard. MIPS is a member-based organisation that provides professional indemnity insurance to over 50,000 registered health practitioners and students across Australia, including specialists across all medical specialties.

MIPS understands that the standard has been revised to facilitate the development of a new pathway for specialist registration under powers that already exist under Section 58(b) of the National Law. MIPS also understands that this work is designed to address ongoing workforce shortages in Australia by creating an expedited pathway to specialist recognition that will not require individual assessment of applicants by specialist medical colleges. Instead, it will require input from colleges about what qualifications it considers to be substantially equivalent, or based on similar competencies, to an approved qualification for the specialty so that applications can instead be directed to the Medical Board of Australia.

MIPS sees the creation of the draft revised standard as a preliminary step only and its support for the draft revised standard should not be taken to be support for any future proposed expedited pathway without first seeing the details of that pathway, which are absent from the draft revised standard.

**Response to specific questions**

**1. Is the content and structure of the draft revised specialist registration standard helpful, clear, relevant, and workable?**

Yes. The draft revised standard accurately reflects the pathways available under the National Law and is clearly written.

**2. Is there any content that needs to be changed, added, or deleted in the draft revised specialist registration standard?**

Further details about the proposed expedited pathway are essential.

**3. Are there any impacts for patients and consumers, particularly vulnerable members of the community, that have not been considered in the draft revised specialist registration standard?**

No, not in relation to the draft revised standard. However, without seeing the details of the proposed expedited pathway, it is not possible to comment on whether there may be impacts for patients or vulnerable consumers once the detail of the pathway is revealed.

**4. Are there any impacts for Aboriginal and Torres Strait Islander Peoples that have not been considered in the draft revised specialist registration standard?**

No, not in relation to the draft revised standard. However, without seeing the details of the proposed expedited pathway, it is not possible to comment on whether there may be

impacts for Aboriginal and Torres Strait Islander Peoples once the detail of the pathway is revealed.

**5. Are there any other regulatory impacts or costs that have not been identified that the Board needs to consider?**

None are apparent at this stage.

**6. Do you have any other comments on the draft revised specialist registration standard?**

MIPS does not have any concerns or comments in relation to the draft revised specialist registration standard. It appears to reflect existing requirements under the National Law. However, MIPS believes that further consultation is essential once the details of any expedited pathway have been proposed. MIPS also believes that the specialist medical colleges are best placed to judge whether a qualification is “substantially equivalent, or based on similar competencies, to an approved qualification for the specialty”. MIPS looks forward to being involved in future consultations on this issue, so we can better understand the issues.

Please do not hesitate to contact me should you require any further information.

Yours sincerely



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cc. Barry Leung  
Acting Chief Executive Officer, MIPS