

13 April 2011

Committee Secretariat  
Finance and Public Administration Reference Committee  
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Parliament House  
Canberra ACT 2600

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Dear Committee Secretariat

**Re: Inquiry into the Administration of Health Practitioner Registration by the Australian Health Practitioners Regulation Agency**

Thank you for the opportunity to provide a submission to the Inquiry into the Administration of Health Practitioner Registration by the Australian Health Practitioners Regulation Agency.

The Royal College of Pathologists of Australasia (the College) supported the introduction of a National Medical Registration Scheme and acknowledges the enormity of the task in the implementation of such a scheme. The College will detail some issues of concern that our Fellows have raised in relation to its implementation.

1. The decrease in the speed of processing applications with delays in the medical registration of doctors has been a major concern. Our NSW Councillor said he was personally aware of ten registrations that had taken an outrageous amount of time.

Some examples provided to us have been:

- A doctor with an Australian medical degree who specialised in Australia, was then unregistered for two years while doing research overseas. It took 3 months to become re-registered.
- An Australian graduate and specialist who worked overseas for four years applied for registration on December 22 2010, received an email on February 22, 2011 from someone who was doing 'an initial assessment' of his application for re-registration.
- A UK trained doctor who had worked in New Zealand for 5 years applied in September 2010 for limited registration as registrar in a training program was only registered the day before the current clinical year started (ie January 2011).
- A doctor who applied for routine annual registration by mail one month before his registration expired, and whose registration was not renewed by the expiry date (although he could continue working as he had submitted an application) however the website indicated that his registration had expired. The College understands that this has been addressed now with modification to the website.
- A doctor who failed to renew his registration applied for the 'fast track' procedure that is supposed to take 2-4 days. He was registered after 12 days.
- A Fellow advised he renewed his registration (due at the end of September 2010) at the end of August online, he has still not received any notification that he was registered (though he checked online and was).

2. Communication with AHPRA has been very bad, in particular, time spent on the phone awaiting service and not being able to speak to the appropriate people when they finally get through. One example of poor communication is a Fellow returned a phone call from someone in the Sydney APRHA office, got put through to the Melbourne switchboard and was told that no-one of that name worked in the organisation. We are advised that the Call Centre arrangement has been changed and they have improved.
3. Concerns have been expressed about the consistency of the information given over the phone to people enquiring about registration.
4. Concerns have also been expressed over the increased cost. The justification for an increase in cost, for a markedly decreased service, has been a concern.

The College has however been grateful for the consultation process AHPRA has undertaken in developing Policy and Regulatory Guidelines. AHPRA has taken onboard the College's concerns appropriately.

Further, the College has been appreciative of the efforts of Dr Joanne Katsoris, Executive Officer, Medical Board of Australia, who attended the Committee of Presidents of Medical Colleges CEOs meeting which provided an opportunity of two-way dialogue. She has also been very helpful in clarifying concerns raised by Fellows about policy and procedural matters.

Whilst there have been problems, the College considers AHPRA has been listening to concerns and where possible improved systems.

Yours sincerely

Dr Debra Graves  
**Chief Executive Officer**