



The Australasian College of Cosmetic Surgery
Raising Standards, Protecting Patients

24 March 2010

Dr Stephen R Phillips OAM
Chair
Recognition review group on cosmetic medical practice
Australian Medical Council
PO Box 4810
KINGSTON ACT 2604

Dear Dr Phillips

Re: Assessment of the Application for recognition of Cosmetic Medical Practice as a Specialty

Thank you for your request for additional information for the Economic Sub-committee of the Recognition of Medical Specialties Advisory Committee (RoMSAC).

The College is grateful for the Council's understanding over the delay in preparing this response as well as for its appreciation of the demands consequent to fulfilling the requirements of the application of recognition of a new medical specialty. Responding to the review group's request has been a beneficial process for the College.

Before addressing the sub-committee's questions, we wish to restate what we noted in our response to the Council's previous request for supplemental information – i.e. despite the evident substantial growth of cosmetic medical procedures performed in Australia, there remains a dearth of available data.

As noted in the College's Application, this is due in part to the fact that cosmetic surgical and medical procedures are almost entirely delivered outside of the Medicare system and provided by a diverse range of practitioners; and the Commonwealth and States have not as a matter of course collected this information.

The College attempted again to uncover additional data beyond that provided in its Application – e.g. included in government reports, university or other research papers or journals – with only very modest success. And to the ACCS's knowledge, the ASPS, the RACS or other Colleges, whose members may provide cosmetic medical procedures, have not published such data. Certainly they have not been prepared to share such data with the ACCS despite repeated requests.

Where such data is not available, the College has sought to make carefully reasoned arguments in accordance the AMC's Full Application Aid in answer to the Sub-committee's supplemental questions.

Nevertheless, given the AMC's request, the substantial growth of cosmetic medical procedures in Australia, the desirability of having this data in order to inform public discussion, advance health care policy and outcomes, as well as support the case for the establishment of the specialty, the College has tasked a working group to advise which additional data to collect and how best to do so.

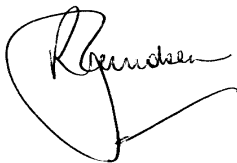
One difficulty which we have alluded to is the concern that economic interest and inter-College rivalry may impede data collection by the ACCS. Making assessments about the impact on, for example, the burden of disease, without access to a variety of empirical data beyond the ability of any one College or other single organisation to obtain would not yield an accurate analysis and may indeed only provide an incomplete and distorted result.

With these concerns in mind, the working group has already suggested that a neutral third party such as the Australian Health Ministers' Advisory Council or other assist in this task. The College would certainly entertain providing support and funding to ongoing data collection.

Although the College hopes that such an initiative will be successful, the working group is also looking at alternatives and the College intends to provide additional data. The College will be conducting a census report at its upcoming annual conference in April, much like one developed by the American Board of Cosmetic Surgery, which the College will forward to the AMC as soon as it is complete.

The College hopes the information provided in response to the review group's questions will be helpful in its assessment of the application for recognition of cosmetic medical practice. We look forward to meeting members of the review group and assisting them in their site visits and other enquiries. Please do not hesitate to contact me directly if I can be of further assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R Knudsen', with a large, sweeping flourish extending from the bottom of the signature.

Dr Russell Knudsen
President

Attachment