

BRIEFING PAPER

Australasian College of Physical Scientists and Engineers in Medicine Inclusion in the National Registration and Accreditation Scheme (NRAS)

Introduction

The Australasian College of Physical Scientists and Engineers in Medicine (ACPSEM) is seeking inclusion of physicists, scientists and engineers working in medicine in the National Registration and Accreditation Scheme (NRAS). The College has invested significant time and resources developing a draft application responding to the current criteria for entry, supported by significant input from the profession. ACPSEM has previously worked with a consultant to support their application with the initial focus on the development of the application. ACPSEM is now seeking assistance to progress their goal of inclusion in the NRAS, with support to update their approach and application in response to the current regulatory policy context.

This brief provides an update based on initial work to review ACPSEM materials, review the current regulatory policy context, and seek information from the Department of Health, Disability and Ageing about the work of the Health Workforce Taskforce (HWT).

Policy context

The Australian government commissioned an Independent Review of the National Registration and Accreditation Scheme (NRAS) in mid-2024. The report was completed in 2025 and recently released by the Australian Health Ministers. [The full report can be found here](#).

The Australian Health Ministers (HMM) issued a subsequent communique ([see here](#)) in September 2025 in response to that review outlining their initial response to the NRAS Complexity Review and setting priority recommendations. The HMM endorsed recommendations are:

- Directing HWT to review and revise the risk assessment method and the process for assessing professions for entry to the National Scheme by mid-2026.
- Issuing a policy direction to Ahpra to strengthen accountability for accreditation functions.
- Directing Ahpra to take immediate steps to improve complaints processes.

Health Ministers have requested further advice from the HWT on the remaining recommendations.

Health Ministers also announced that the Health Practitioner Regulation National Law would be amended to regulate audiology under the NRAS structure after the completion of a Regulatory Impact Statement (RIS) and support for audiology inclusion by the Queensland and South Australian ministers.

Implications for ACPSEM

The decision to review and revise both the risk assessment method, and the process for assessing professions for entry to the National Scheme means that the draft application developed by ACPSEM cannot yet be progressed. Advice from government has made clear that:

- New assessment criteria are currently being developed that may require re-focusing or re-writing at least some components of the draft application developed by ACPSEM. Government is not seeking to consult with the public as they consider consultation was undertaken as part of the NRAS Complexity Review.
- Some Health Ministers are unsupportive of the proposal for professions to be able to submit Expressions of Interest for potential inclusion under NRAS, as recommended in the NRAS Complexity Review final report, and have asked for advice about options. Decisions about how professions can apply for inclusion will play a critical role in determining how ACPSEM will need to proceed once an application is ready for submission.
- Audiology will be used as the test case for new approaches and may impact the options that Health Ministers have in relation to regulation as well as the timing of application opportunities for ACPSEM.
- The NRAS Complexity Review proposed an additional layer of regulation between full inclusion and self-regulation/regulation under the National Code of Conduct for Health Workers and Health Ministers may decide to progress with this option for audiology. This would create additional potential options and implications for ACPSEM.

Suggested next steps

ACPSEM should expect that there will be limited opportunities to influence the work of HWT over the coming months and no immediate opportunity to begin re-shaping the current draft application or move actively towards the process of application. However, a number of professions have indicated their own interest in influencing decision-making about assessment criteria and application processes and consultation opportunities may emerge that ACPSEM should be ready to capitalise on.

While work towards formal recognition cannot yet progress, an initial review of work developed by ACPSEM suggests that there are activities that can be undertaken that would complement and support any work towards recognition and help respond to some of the key issues identified by ACPSEM and its members.

Given that, ACPSEM should seek to:

1. Maintain a watching brief in relation to the work of HWT, any progress in relation to audiology regulation, and decision-making by Health Ministers and maintain capacity to provide input or engage Health Ministers or HWT if needed.
2. Re-visit the key issues and goals identified by ACPSEM and consider other potential strategies to address these that would achieve similar outcomes without endangering a future application for recognition. For example, while legislative title protection would require recognition, there may be alternative approaches that achieve similar outcomes.
3. Develop a priority list of issues and goals based on their importance to the profession and the potential viability of undertaking effective work to address these issues.
4. Commence work on implementing those strategies.