



Response template for providing feedback to public consultation – draft revised professional capabilities for medical radiation practice

This response template is an optional way to provide your response to the public consultation paper for the **Draft revised professional capabilities for medical radiation practice**. Please provide your responses to any of the questions in the corresponding text boxes; you do not need to answer every question if you have no comment.

Making a submission

Please complete this response template and send to medicalradiationconsultation@ahpra.gov.au, using the subject line '*Feedback on draft revised professional capabilities for medical radiation practice*'.

Submissions are due by midday on Friday 26 April 2019.

Stakeholder details

Please provide your details in the following table:

Name:	Shawna Farquharson
Organisation Name:	The Florey Institute of Neuroscience & Mental Health

Your responses to the preliminary consultation questions

1. Does any content need to be added to any of the documents?

Whilst I appreciate this document makes reference to the safety issues in MRI, I have concerns that the key capabilities outlines for MRI radiographers do not adequately address the level of proficiency and ongoing training required by MRI radiographers to ensure a safe practice in the MRI environment.

- MRI is a speciality field that, in my opinion, should require additional post-graduate certification.

2. Does any content need to be amended or removed from any of the documents?

Key Capabilities & Enabling Components:

3. Understand the different methods of imaging and treatment to determine the most appropriate option. Items C, D & E

- The above components are focused on radiation therapy. These enabling criterion inappropriately suggest that MRI should be understood in an overly specific and limited capacity. Future drafts, should provide enabling component statements to be either more generic (rather than focussed on oncology), or better address the capabilities needed specifically for MRI Radiographers.

4. Confirm the procedure to clinical indicators. Items A, B & C

- Whilst I applaud the efforts to better address the need for radiographer / technologist role extension in this area, the possibility of this advanced practitioner role will need to not only be supported by all stakeholders, it will also require appropriate post-graduate certification and training opportunities to support such a role extension.

- Whilst 'experienced' radiographers have the 'knowledge and are capable' of performing these duties, the reality is that many Australian sites do not have infrastructure or medical oversight to provide the appropriate levels of support for radiographers / technologists to routinely perform the advanced duties as outlined.

- This section should be revisited with consultation with RANZCR, and possibly input from the appropriate bodies in the UK & NZ – where they have already successfully moved toward having Radiographer Professionals in certain speciality areas and/or post-graduate certification.

7. Deliver Patient/client care. “The patient/client and their family/carers should also be informed”

- Whilst I appreciate the need for this statement, this aspect of the proposal should be discussed further, with consultation with RANZCR, in regards to the medico-legal implications etc..

8. Apply knowledge of safe and effective use of medicines to practice. Item #D

- The safe and effective delivery of medicines should incorporate the expertise of the supervising medical doctor in the prescription, delivery and monitoring of medicines to practice. If Radiographers and Technologists are to be accountable for the prescription, delivery and monitoring of a range of medicines, it is important that a 'recommended framework' is also proposed to support the safe delivery of specific medicines by Radiographers and Technologists working in any environment (both clinical & research).

9. Perform Magnetic Resonance Imaging

These baseline recommendations for the general registration as a medical practitioner performing MRI do not adequately address the knowledge required, and the ongoing training needs for this professional speciality area.

3. Do the key capabilities sufficiently describe the threshold level of professional capability required to safely and competently practise as a medical radiation practitioner in a range of contexts and situations?

The minimum threshold level for a MRI radiographer need to be better identified. MRI is a speciality field that, in my opinion, should require additional post-graduate certification.

4. Do the enabling components sufficiently describe the essential and measurable characteristics of threshold professional capability that are necessary for safe and competent practice?

No. The components fall short for the role of MRI radiographer.

5. Is the language clear and appropriate? Are there any potential unintended consequences of the current wording?

The language is clear, however, further consideration needs to be given to the abovementioned points.

6. Are there jurisdiction-specific impacts for practitioners, or governments or other stakeholders that the National Board should be aware of, if these capabilities are adopted?

RANZCR

7. Are there implementation issues the National Board should be aware of?

One of the concerns I have about the current set-up in Australia is that the 'guidelines' do not prevent non-Medical Imaging Practitioners from performing medical imaging examinations in a research environment. As a result, *we are a profession with a protected title without a protected role.*

- It is a 'loop hole' that is often exploited in research settings, and one that is used to keep 'operational costs' to a minimum. An obvious additional concern is that this is also a disadvantage to patients and participants.

8. Do you have any other general feedback or comments on the proposed draft revised professional capabilities?

- This document, as proposed, is a reasonable first step toward defining basic requirements. However, it is not specific enough when it comes to clearly identifying levels of post-graduate qualifications and/or ongoing training needs for specialised areas such as MRI. Areas such as MRI and Ultrasound, require a high skill and competency levels to be 'attained and maintained' by Medical Imaging Professionals.

- I also would like to emphasise that I believe that AHPRA need to better recognise that there is currently (and will increasingly be), a need to develop 'Advanced Practitioner Roles' in many areas of medical imaging.

- Increasing technological advance and clinical demand, mean that there a service gaps that need to be (in the first instance) acknowledged, and then addressed (with appropriate support, consultation and oversight) by Medical Imaging Professionals.