

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:	Christopher Edwards - Chair
Organisation Name:	Australian Sonographers Accreditation Registry

Your responses to the preliminary consultation questions

1. Does any content need to be added to any of the documents?
<p>The Australian Sonographers Accreditation Registry (ASAR) did identify further content to be added to the respective documents under</p> <p>2. Key capabilities and enabling components</p> <ul style="list-style-type: none">• Add Domain 1D Sonographer
2. Does any content need to be amended or removed from any of the documents?
<p>ASAR did identify content needed to be amended as identified in Question 4</p>
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?
<p>ASAR identified the key capabilities 10. Perform ultrasound imaging should include completion of an ASAR accredited postgraduate sonography course, which includes completion of minimum clinical training requirements, then being eligible for entry onto the Registry of Accredited Medical Sonographers.</p>
4. Do the enabling components sufficiently describe the essential and measurable characteristics of threshold professional capability that are necessary for safe and competent practice?
<p>The ASAR did identify that the enabling components for Key Capabilities 10 - Perform ultrasound imaging did not describe the essential and measurable characteristics of threshold professional capability that are necessary for safe and competent practice. The below dot points would accurately describe Key Capabilities 10 – Perform ultrasound</p> <ul style="list-style-type: none">• For the purposes of performing diagnostic ultrasound the participant must be listed as an accredited sonographer with the ASAR, as per regulations provided by the Medicare Benefits Schedule (MBS) and The Diagnostic Imaging Accreditation Scheme (DIAS) under the Health Insurance Act 1973.• Be compliant with relevant sonography Continuing Professional Development (CPD) programs as per the ASAR CPD program• Be able to effectively communicate findings of the examination in an appropriate and timely manner to other health care professionals and relevant service providers to maintain the continued safety and high-level health care to the public

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

ASAR did not identify any unintended consequences of the current wording. The language was clear and appropriate

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?

ASAR did identify specific jurisdiction impacts for ASAR accredited sonographers

- The majority of ASAR accredited sonographers will not be registered with the Medical Radiation Practice Board of Australia (MRPBA) which would allow Radiographer/sonographers to be regulated inconsistently with sonographers only. An example is a de-registered Radiographer/sonographers will only affect their ability to perform Radiographic duties but still perform ultrasound. There is the potential to increase the risk to the public if the individual continues to perform only ultrasound services.
- As it stands ASAR does not have the constitutional authority to remove an individual from the register, other than for fees non- payment and/or CPD default.

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

ASAR did identify implementation issues as outlined in Question 6

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

No further feedback.