

21.9.2012

Submission to the Medical Radiation Practice Board of Australia

The Board is now seeking your submissions on the following:

Question a

Do you agree with the proposed inclusion of at least one educationalist, at least one medical radiation academic, at least one medical radiation practitioner and at least one allied health sciences academic to the Committee?

Answer: No

The group should have the following:

Medical Physicist Academic / Clinical

Medical Radiation Practitioner _ must be in a Clinical Tutor role

Medical Radiation Academic Clinical co-ordinator

Representatives from the Australian Institute of Radiography (PAEB) for

1. Diagnostic Radiographers
2. Radiation Therapists
3. Sonographer
4. Nuclear Medicine – because of hybridised of equipment.

Accreditation Committee should have available to choose from representatives of:

1. Academic Institutions from any faculty
2. Accredited Professional Bodies

Question b

Do you think there should be additional sub-criteria for the selection of the above persons and if so what should they be?

Answer: Yes

Accreditation Committee should have available to them a choice of representatives from:

1. Academic Institutions from any faculty would permit valuable views to be sort as changes are made in the delivery of education.
2. Accredited Professional Bodies that may represent others who would fall under this registration where two groups represent the same profession or profession bodies that require standards of work to be meet. I.e. Radiologists that have legal obligations demanded of them.

Question c

Do you think a Board member should be on the Accreditation Committee?

Answer: Yes

Question d

Do you think a community representative should be on the Accreditation Committee?

Answer: No.

Question e

How many members do you think the Committee should have?

Answer: Seven (7).

The committee should have four (4) as a minimum from the core group, two (2) from the selected sub group and one (1) from the Board.

In considering the proposed membership, it should be noted that although including a Board member on the Accreditation Committee would facilitate communication between the Board and the Committee:

Question f

The National Law makes a clear intention to separate the regulatory and accreditation functions, and

I agree, but also have the institutions that provide the education not be the accreditors for themselves or reciprocate others. I.e. you do mine ok, I'll do yours.

Question g

Board members can be regarded as holding fiduciary positions *vis a vis* their Board, i.e. membership of a National Board requires primary allegiance to the Board. There may, therefore, be a conflict of interest if a Board member is also a member of the Accreditation Committee.

This person would be a board representative, limited to the role of a chairperson for the committee, as well as a link back, convenor of meetings and audits.

Comments:

I would also like to see included in the roles of the accreditation committee:

1. The accreditation of the facility in respect to the numbers of students allowed enrolling in the course. Open universities are great but the facilities are over stretched and standards are falling because of it.
2. The educational institutions be limited to Universities but allow them to offer certificates or diplomas in related professions like dental radiography, vet radiography, industrial radiography, radiation health and safety, PACS administration and other new technologies as they developed. This would allow a mix of revenue streams.
3. Continuing Professional Education (CPE). The standards for this need to be addressed.
4. The accreditation of the work places also needs to be addressed. Too many students are being supervised by NPDP staff, signing off on examinations done by students they have observed. The universities can provide a high standard of academic learning but rely on the clinical work place to provide the skills needed. This will become even more important as SIM and online learning are introduced, replacing more traditional methods of passing on these skills.
5. The cost of being a registered. The costs are more than I would have anticipated as there are no benefits such as insurance or other services. The

registration does have setup costs I understand, but to have multiple registrations for the NSW Environment and Heritage, AIR and now national registration is extreme.

Thank you for the opportunity to add my views.

If this is added to a forum or published I would appreciate that it be made an anonymous contribution.

Yours sincerely

Anonymous