

28 March 2013

Executive Officer
Medical Radiation Practice Board of Australia
AHPRA
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Melbourne VIC 3001
medicalradiationconsultation@ahpra.gov.au

Executive Officer,

**ADIA Submission regarding the:
*Draft - Provisional Registration Guideline and
Draft - Supervised Practice Registration Standard
Relating to medical radiation practitioners***

1. Draft Provisional Registration Guideline
ADIA supports the development of a Provisional Registration Guideline to set out the requirements of the National Board, as outlined in the draft guideline (i.e. Option three).
2. Draft Supervised Practice Registration Standard
ADIA recognises that there are no standards around supervised practice at present and therefore supports the objective of developing a Supervised Practice Registration Standard (the draft Standard) for the purpose of ensuring safe independent practice.

The *Program of Supervised Practice* tied to the draft Standard has not yet been defined, in terms of its content, duration and competency assessment. It is ADIA's view that this program should be open to industry/professional consultation before implementation.

ADIA believes that requirement (i) of the draft Standard, requiring practitioners:

“be supervised in circumstances where the ratio of supervised practitioners to supervising practitioners does not exceed 1:1”

...is not always practical or viable in a small private practice setting, particularly in circumstances of remote or indirect supervision. While ADIA supports adequate and appropriate supervision at all times, it believes that this ratio may be unintentionally and unnecessarily restrictive for the profession in terms of access to the provision of supervised placements for new graduates.

ADIA represents private diagnostic imaging practices in Australia. Its members operate comprehensive practices providing services to patients in metropolitan, rural and regional Australia; are both for-profit and charitable and operate practices in the community and in public and private hospitals in Australia. Pattie Beerens, Chief Executive Officer can be contacted on 03 9867 5070 or via email at pbeerens@bconsulting.net.au.

Yours sincerely,

A handwritten signature in black ink that reads "Pattie Beerens". The signature is written in a cursive, flowing style.

Pattie Beerens
Chief Executive Officer
Australian Diagnostic Imaging Association