



Australian and New Zealand Society
of Nuclear Medicine Limited

ABN: 35 133 630 029

19th January 2012

Mr Neil Hicks
Chair
MRPBA

By email: medicalradiationconsultation@ahpra.gov.au

Re: Registration Standards Proposed by the MRPBA

The Australian and New Zealand Society of Nuclear Medicine (ANZSNM) is the peak national professional organisation representing representatives from all disciplines involved in Nuclear Medicine, with the majority of members comprising of Nuclear Medicine Technologists/Scientists, which form the ANZSNMT.

Please find attached the official position and recommendations from the ANZSNM & ANZSNMT regarding the Registration Standards proposed by the MRPBA.

On behalf of the ANZSNM and ANZSNMT, we thank you for the opportunity to comment on this consultation.

Thank you very much.

Yours sincerely,

Dr Sze Ting LEE
President
ANZSNM

Ms Elizabeth Bailey
Chair
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**AUSTRALIAN & NEW ZEALAND SOCIETY OF
NUCLEAR MEDICINE LTD.**

**Submission for Registration
Standards proposed by the
Medical Radiation Practice Board
of Australia**

Submitted by:

**The Australian and New Zealand Society
of Nuclear Medicine Ltd. (ANZSNM)**

January 2012

PREAMBLE:

The Australian and New Zealand Society of Nuclear Medicine Ltd. (hereafter known as ANZSNM) is the national professional organisation representing professionals from all disciplines involved in the field of Nuclear Medicine, and was inaugurated in May 1969.

The first officially recognized course in Nuclear Medicine was established in 1964 by the Royal Melbourne Institute of Technology (RMIT) and was of three years duration. The qualification was known as "The Radioisotope Technician Certificate" and was the first of its type in the world. The ANZSNM began to be involved in training and course accreditation in 1971 and is the gazetted body authorised by AEI-NOOSR to assess the overseas qualifications in Nuclear Medicine Technology for applicants wishing to practice as a Nuclear Medicine Technologist /Scientist (NMT/S).

The ANZSNM is the current professional body representing the vast majority of NMT/S in Australia, with approximately 80% of working practitioners being members of the Society. The ANZSNM is the peak body consulted by other health organisations and legislative bodies for issues relating to the NMT/S, including such areas as workforce, training, education, accreditation and continuing professional development (CPD). The Accreditation Board is a sub-committee of the ANZSNM and is responsible for setting standards for the education and training of NMT/S as well as accreditation of university programs for the study of Nuclear Medicine Technology.

The ANZSNM welcomes and supports the introduction of national registration under the National Registration and Accreditation Scheme (NRAS) for Medical Radiation Practitioners and NMT/S. The standards proposed in your documentation are very similar to our Society's standards, and we have made comment on each section, as below:

PROPOSED REGISTRATION STANDARDS:

1) Advertising Guidelines

The proposed guidelines are consistent with the standards upheld by the ANZSNM and we agree with the proposed recommendations.

2) Code of Conduct for registered health practitioners

This is standard for all health professions and we agree with the recommendations.

3) Guidelines for mandatory notifications

This is standard for all health professions and we agree with the recommendations.

4) Supervised Practice

a) The number of clinical weeks required to be completed by a recent graduate for the purposes of general registration is 48 weeks, being the same for both the 3 and 4 year course. This must be undertaken in a facility that has been approved by the Accreditation Board of the ANZSNM for the training of NMT/S. This professional development year (PDY) is an important component of the graduates training and contributes to the development of their clinical skills. The 4 year courses with an

embedded clinical practice year being offered are not approved by the ANZSNM, who support the continuation of a period of supervised practice.

b) The assessment of 'fitness to practice' should be determined on an individual basis and take in to account the clinical competence level of the individual as determined by recency of practice, years of experience and maintaining of CPD requirements.

c) The Accreditation Board of the ANZSNM recently reviewed the PDY program and requirements for supervised practice. Following this revision, a new set of guidelines for mentoring and the PDY have been implemented. This is a very comprehensive document that covers all areas necessary to practice as a NMT/S. The ratio of accredited technologists to PDY is defined as 1.25FTE to allow cover for annual leave. The ANZSNM support the adoption of the existing program of supervised practice for NMT/S and the defined ratio by the national board. Of note, there is currently a severe shortage of nuclear medicine technologists in WA and a heavy reliance on trainees from other States to fill these vacancies. The MRTRBWA policy regarding PDY graduates mandates that a registered technologist must be in the same room as the trainee for the first 24 weeks and physically on the same site for the second 24 weeks. This is in contradiction to the ANZSNM and AIR guidelines for PDY training. As a result the previous practice of remote supervision for areas situations such as on-call is disallowed. The definition of supervision must be clearly defined in the new regulations and not compromise employment opportunities in remote states.

d) In regards to provisional registration, the requirements for supervised practice should be assessed individually and contingent on such factors as years of experience, recency of practice, overseas qualifications and clinical skills. The ANZSNM would support indirect supervision after the above factors have been considered. If the registrant provides evidence of some clinical practice within the last 3 years then indirect supervision would be appropriate.

e) The ANZSNM ratio of accredited technologist to PDY trainee is 1.25FTE and the ANZSNM supports the continuation of this ratio.

f) The ANZSNM allows for a NMT/S to participate in the on-call roster after 6 months work. This is at the discretion of both the trainee and their employer and the trainee will never be allowed to participate if they are not competent. However, the trainee must be supervised either by a nuclear medicine specialist or an accredited NMT/S either directly, or over the telephone. The ANZSNM supports the continuation of the existing guidelines for supervised practitioner on-call.

g & h) The ANZSNM support the continuation of a 48 week period of supervised practice for all graduates. The level of training and experience required is outlined in the existing PDY training guidelines and covers all aspects of nuclear medicine necessary to work as a fully registered practitioner. This includes graduates of the 4 year embedded clinical practice programs.

i) Maintaining a supervised practice program is advantageous to the profession as it will ensure that all registered practitioners are trained in all aspects of the profession and receive an equivalent clinical skill set that will enable them to provide a high level of patient care.