

Submission to:

The Medical Radiation Practice Board of
Australia

On the proposed

Supervised Practice Guidelines for Medical Radiation Practice

July 2013

The Victorian Society of Nuclear Medicine Technologists (VSNMT) welcomes the opportunity to provide the Board with a submission in respect to the draft *Supervised Practice Guidelines for medical radiation practice*.

Preamble: The VSNMT is a professional organisation representing nuclear medicine technologists engaged in the public and corporate sectors and academia.

The VSNMT has an active involvement in the education and training of nuclear medicine technologists. For many years it has administered the nuclear medicine technologists' intern program in Victoria on behalf on the Australian and New Zealand Society of Nuclear Medicine (ANZSNM).

Further, in 2013 in partnership with the Victorian Department of Health, the VSNMT introduced a new model for supervised practice. This model was developed based on a review of the current literature and requirement to demonstrate clinical competence and professional conduct.

General Comments:

One of the principle objectives of the National Law is to

Provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

and

to facilitate the provision of high quality education and training of health practitioners.

It is the responsibility of all stakeholders to ensure these objectives are met in the interests of public safety. In a previous consultation most respondents argued for some form of supervised practice. The VSNMT supports the value of a period of supervised practice. Currently a practitioner is required to undertake supervised practice if he/she is a graduate of an approved three year program of study where clinical training within that course is not considered sufficient to meet the requirements of general registration.

The VSNMT is, by definition, a Victorian based organisation and as such its principle focus is on a safe and effective supervised practice program for RMIT nuclear medicine graduates. There is

however considerable expertise and interest in supervised practice within our community and our comments are hopefully valuable in the national context.

The VSNMT is of the view that provisional registrants (i.e. graduates of approved three year programs who require a defined period of supervised practice) should be regarded as a separate group from other practitioners requiring a period of supervised practice. The supervised practice plan for provisional registrants should contain the same requirements for all graduates of that particular program.

The VSNMT has developed a cluster model for supervised practice. This model has been carefully thought out and incorporates rotations to three diverse sites. The rotations ensure registrants are exposed to a variety of experiences ranging from larger teaching hospitals, to corporate and regional sites. The VSNMT believes this produces a well-rounded practitioner who has been exposed to a range of nuclear medicine procedures in diverse clinical environments. We would strongly argue this model is successful and should be maintained and supported by the Board. Finally, while supporting the overall direction of the Board we consider the task of developing guidelines to be extremely complex and one which requires significant further consultation.

Specific Questions for Comment

1. Are the principles of supervision suitable?

Comment: We believe provisional registrants should be a distinct group.

The VSNMT would request some involvement in the drafting of the supervised practice plan for graduates of the RMIT nuclear medicine program.

The VSNMT also requests that the Board accommodates the distinctive way supervision is provided within the cluster model. We believe the Board's requirements can be delivered within this model.

2. Do the principles provide sufficient capacity to supervise and assess practitioners in a range of clinical settings?

Comment: The VSNMT believes the principles do provide the capacity. We would however request a discussion to ensure the Board's requirements were met within our local model.

3. Are the levels of supervision appropriate?

Comment: The levels of supervision are appropriate for practitioners with conditions, those returning to practice or those holding an overseas qualification. The levels of supervision are not necessarily appropriate for provisional registrants and in particular those participating in the Victorian program. Practitioners in this program will not progress through levels of supervision in all areas. Because different skills are taught at different sites, the required levels of supervision will vary to accommodate the capability of the practitioner at that time.

The VSNMT would ask the Board to elaborate on how it determines what the required levels of supervision, both starting and progressions.

We would request discussions with the Board on the whole question of supervision of the provisional registrants in the Victorian program.

4. Do the guidelines adequately describe the responsibilities of the supervised practitioners?

Comment: The VSNMT has no significant experience in relation to practitioners with conditions, those returning to practice or those holding overseas qualifications.

This section however presents several difficulties for provisional registrants in Victoria.

As an example, in the Principles of Supervision - section 3, the guideline states *the provisional registrant and their principal supervisor must understand and agree to the supervised practice **plan provided by the Board***. This seems at odds with section 3 of the responsibilities of supervised practitioners which requires the supervised practitioner to *establish at the outset their learning needs, the context relevant to the need for supervision and any other issues that may affect the supervisory arrangement*.

The VSNMT requests discussion with the Board with regard to this section as it relates to provisional registrants.

5. Do the guidelines adequately describe the requirements and responsibilities of the supervisors and principal supervisors?

Comment: The VSNMT supports the guidelines with regard to **Supervisors**. Our only comment would be to request that they hold general registration with the Medical Radiation Practice Board of Australia.

With regard to **Principal Supervisors**.

Section 4.2.4 requires they be approved by the National Board. What would be the criteria for Board approval?

Section 4.2.10 uses the term *performance reviews*. Is this the correct term in the context of a provisional registrant?

Section 4.2.14 requires *approval of the National Board for any proposed changes to the supervised practice plan before they are implemented*. The VSNMT would request clarification of the intent of this requirement.

Section 4.2.15 requires the principal supervisor *provide reports to the Board*. This requirement requires further clarification.

Section 4.2.16 requires the *National Board be notified if the relationship between the principal supervisor and the supervised practitioner breaks down*. How is this defined and what are the consequences should this occur?

Section 4.2.16 also requires the National Board be notified if *the supervised practitioner is not complying with conditions imposed or undertakings accepted by the Board, or is in breach of any requirements of the supervised practice plan*. What happens after this occurs, how quickly is this addressed and by whom?

Section 4.3 The VSNMT fully supports the Boards position on the skills and experience of supervisors.

6. Are the requirements of the supervised practice plan appropriate?

Comment: The VSNMT could not comment without examining at least a draft of a standard supervised practice plan for provisional registrants. We would welcome the opportunity to contribute to the development of a plan.

While having no direct experience with supervised practice in the other three categories we would make the following comments. We would suggest that in addition to forms A,B and C the Board provide a form which would be signed by the management of the facility

acknowledging the presence of the practitioner and institutional support for the period of supervised practice.

7. Should supervised practitioners be able to provide on-call and after hours services?

Comment: We would not support provisional registrants providing on-call or after hours services unless they were directly supervised.

We could accept there may be situations where practitioners returning to practice or with overseas qualifications could provide these services. The Board would have the expertise to decide if this was safe.

8. Do the guidelines adequately describe the assessment reporting requirements?

Comment: A definitive response is not possible until the supervised practice plans are detailed.

9. Are the definitions appropriate?

No Comment

10. What is the likely impact of this proposal on individual registrants?

Comment: The requirements of the program, and in particular the supervision requirements, may mean fewer facilities are prepared to participate.

11. Are there jurisdiction-specific impacts for practitioners, or governments or other stakeholders that the National Board should be aware of, if this registration standard is approved?

Comment: The VSNMT has a close relationship with the Victorian Department of Health who have funded both the development of the new supervised practice model for provisional registrants and who fund the medical radiation intern training program. As such, they would have a strong interest in any supervised practice guidelines.

12. Is 1 November 2013 a suitable date for implementation?

Comment: This date, while possible would seem to be optimistic given the complexity of the program and the consultation required.

13. Are there any implementation issues the Board needs to be aware of?

No comment.