

Via Email 26/09/2011

Dear Medical Radiation Practice Board of Australia,

Please find following requested feedback on the proposed mandatory registration standards for medical radiation professionals (MRPs).

1.1 The advantages and disadvantages to the proposed requirements for a practitioner to undertake a specified amount of CPD hours versus a requirement for CPD points.

To avoid confusion I believe it would be useful to have the same CPD measurement criteria used between the national registration CPD requirement and approved CPD programs such as the Australian Institute of Radiography (AIR).

1.2 The advantages and disadvantages to the proposed CPD hours

The proposed 60 hours per triennium is reasonable. I believe this is sufficient to ensure MRPs are keeping their skill sets and knowledge current while not placing excessively onerous demands on MRPs to obtain their CPD. I would not like to see this minimum CPD hours requirement increased without stakeholder consultation.

1.3 Whether or not a specified proportion of an individual's CPD should be dedicated to their current scope of practice.

I believe it is suitable to require a proportion of individual's CPD to be in their dedicated field of speciality such as Mammography, MRI and CT. However I believe other disciplines such as general radiography should be exempt or the suggested 10 hours per year reduced.

There is an amount of cross over between several disciplines and thought needs to be given to CPD activities such as CPR, manual handling etc... as to how these will be classified. It is not uncommon for medical radiation practitioners to work in multiple disciplines - up to 4 or 5 disciplines if BMD and general x-ray are included. Requiring these staff to perform 10 CPD hours per year per discipline will place an undue CPD requirement upon them. It is also not uncommon for sonographers to work as part time radiographers, particularly after hours. I fear that having discipline specific CPD requirements for general x-ray will see a big reduction in staff being able to work in this discipline which will place an enormous strain on the ability to provide staff for shift and after hours general radiography services.

1.4 Situations where the Board should consider exempting a practitioner from the requirements of the registration standard.

Non practicing situations such as long term illness, approved applications for exemption items such as extended travel, pregnancy/carers leave, major illness etc...

1.5 The type of CPD activities practitioners should be undertaking
Meaningful and relevant activities.

2.1 The Board proposes to seek Ministerial Council approval for this registration standard to apply to the medical radiation practice profession.

I believe a national police check is appropriate in a healthcare setting. However it is another cost being enforced upon medical radiation practitioners and this should be factored in when considering national registration application fees and annual fees.

3.1 The proposal to accept English language test results obtained in multiple sittings providing they are obtained within the 12 months preceding the application.

I believe this to be appropriate.

3.2 The proposed requirement for practitioners to achieve scores of 7 or above in all four bands of their English language test.

I believe this is appropriate.

3.3 Whether or not there is a need to accept English language tests other than the proposed IELTS or OET tests.

No comment.

3.4 Any additional situations where the Board should consider exempting a practitioner from the requirements of the registration standard.

No.

4.1 Whether or not to specify a minimum level of PII cover and if so, why this would be important.

It should be set at the health sector standard.

4.2 Whether or not to specify a specific number of years that the PII run-off cover should apply and why.

If run-off cover should apply for as long as the statute of limitations exists to provide the public and practitioners ongoing insurance cover.

5.1 Whether or not an absence from practice for three years (but where the practitioner has three or more years experience prior to the period of absence) should require the practitioner to undertake a mandatory amount of CPD within a specified time frame or whether the mandatory CPD requirements only be applied after a five year period of absence.

I believe 5 years is appropriate.

5.2 Possible pathways for re-entry into the profession for practitioners who have had a period of absence from practising the profession greater than three years.

CPD, supervised competency training, a re-entry program if one is developed

5.3 Whether or not a practitioner should be required to undertake a minimum number of practice hours to maintain their recency of practice.

No I don't believe this is necessary. Casual and part time staff may only work a short amount of hours however if they are maintaining their CPD then they will be keeping their skill sets current.

7.1 Methods to assess a practitioner's experience to determine their eligibility for general registration.

No comment.

7.2 The amount of emphasis that should be placed on a practitioner's CPD to determine their eligibility for general registration.

No comment.

Kind regards,

K. Gray