16th March 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    Ms Elizabeth Bailey
President     Chair
ANZSNM        ANZSNMT
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)

16th March 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 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) Continuing Professional Development

The proposed guidelines are consistent with the standards upheld by the ANZSNM and we agree with the proposed recommendations. However make the following comments:

- raise concerns over what constitutes professional development and learning, specifically regarding the inclusion of yearly mandatory fire safety training, manual handling updates, OH&S and infection control as recognised CPD activities;
- the ANZSNM currently recognises maternity leave as an extenuating circumstance and application for a 6 to 12 month exemption from CPD is considered by the accreditation board on an individual basis. We would support the continuation of this clause;
- a mandatory requirement for NMT/S working in remote and rural areas to complete 60 hours CPD over a 3 year period may have a detrimental effect. Education seminars, workshops and branch meetings are generally held in major cities making access to these activities not just geographically difficult but expensive;
- the guidelines outlining the requirements for the CPD Evidentiary Record do not clearly define what constitutes evidence of an activity being completed if a registrant is audited. For example, if an NMT/S undertook a post graduate course of study and claimed 3 hours/week of study, what evidence would be accepted to support this claim?

2) Recency of Practice

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