



Australian and New Zealand Society of Nuclear Medicine Limited

ABN: 35 133 630 029

1st October 2012

Mr Neil Hicks
Chair
MRPBA

By email: medicalradiationconsultation@ahpra.gov.au

Re: Composition of the Accreditation Council

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 composition of the Accreditation Council proposed by the MRPBA in addition to the original recommendations of April 2011 (Appendix A)

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

Thank you very much.

Yours sincerely,

Ms Elizabeth Bailey
President
ANZSNM

Mrs Marcia Wood
Chair
ANZSNMT

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Submission by the Australian and New Zealand Society of Nuclear Medicine (ANZSNM) on the composition of an Accreditation Committee of the Medical Radiation Practice Board of Australia (MRPBA) 1 October 2012

Background

The ANZSNM was part of a group who worked with the Medical Radiation Practitioner Boards and the National Registration Steering Committee (NRSC) from 2009 until present to facilitate a smooth transition to National Registration, advocating on behalf of Nuclear Medicine Technologists. One of the tasks required was to set up a Council to address accreditation of all Medical Radiation Science courses that would meet with the approval of the MRPBA. Prior to National Registration, accreditation for Nuclear Medicine Technologist university programs had been facilitated through the ANZSNM Accreditation Board which ensured that all courses approved for training of Nuclear Medicine Technologists in Australia met and adhered to a consistent and transparent standard.

A second professional group, the Australian Institute of Radiographers (AIR), was also instrumental in this process, and provided representation for both Radiographers and Radiation Therapists, who make up the other Medical Radiation Sciences covered by the MRPBA. Prior to the introduction of National Registration, University programs for these professions were accredited through the AIR.

After significant consultation between all parties, a tripartite agreement was signed (Appendix A). In this agreement, the ANZSNM supported an Accreditation Council structure which ensured the following:

- 1) The standards are national, consistent and transparent, and achieved in a robust and measured manner;
- 2) The requirements of the Health Practitioner Regulation National Law Act (2009) are met by the body exercising these functions;
- 3) There should be equal representation for each of the three Medical Radiation Sciences (Radiography, Radiation Therapy and Nuclear Medicine Technology).

Submission

It is the considered opinion of the ANZSNM that the Accreditation Committee should reflect the fact that three professional entities are covered by the MRPBA, and that the committee should be comprised of **eleven (11)** people as follows:

- Three from the modality of Diagnostic Radiography
- Three from the modality of Radiation Therapy
- Three from the modality of Nuclear Medicine Technology.
- A Community member with knowledge of education and accreditation.
- A director from the National Accreditation Council.

For each of the modalities, one representative should be an academic, one should be a clinician, and one should be a practitioner with current accreditation or registration board experience.

We also feel that the Accreditation Committee should ensure a fair geographical spread of representation, with members drawn from throughout Australia, preferably with each state and territory represented.

We do not support a MRPBA Board member being included on the Accreditation Council as we feel that the inclusion of a member of the MRPBA has potential for a conflict of interest, and has the potential to compromise the separation of regulatory and accreditation functions described under the National Law. As such, effective communication should be encouraged between the chair of the Accreditation Committee and the MRPBA, through official channels.

We also support the inclusion of an Allied Health sciences' academic in the model in place of the community representative, as this would continue to provide a wider community view.

The ANZSNM continues to support the eleven person model previously agreed upon by both ANZSNM and the AIR, and anticipate the continuing support of the AIR in this matter.

Submission to the National Registration and Accreditation Scheme for the Health Professions (NRAS) recommending the appointment of a new external Accreditation Council for Medical Radiation Practitioners and Scientists

1. Introduction

This submission requests that the Australian Health Workforce Ministerial Council (the AHWMC) appoint the **Australian Medical Radiation Sciences Accreditation Council (AMRSAC)** as the entity to exercise accreditation function/s for the medical radiation sciences profession under the Health Practitioner National Law Act 2009.

The Australian Medical Radiation Sciences Accreditation Council (AMRSAC) has been developed over the past three year by the **Medical Radiation Practitioners Accreditation and National Registration Steering Committee (MRP-NSC)** to perform the accreditation functions required by the Health Practitioner Regulation National Law Act 2009.

The MRP-NSC is composed of the following key stakeholders in the Medical Radiation Sciences profession, being:

1. **Conference of Regulating Authorities (CORA) a group** representing the existing State and Territory Medical Radiation Practitioner Registration Boards:
 - a. Medical Radiation Technologists Board of Western Australian;
 - b. Medical Radiation Practitioners Board of Victoria;
 - c. Medical Radiation Technologists Board of Queensland;
 - d. Radiation Science Professionals Registration Board of Tasmania;
 - e. Radiographers Board of the Northern Territory;
 - f. Medical Radiation Scientists Board of the Australian Capital Territory;
and
 - g. Medical Radiation Technologists Board (New Zealand);
2. Australian Institute of Radiography (AIR) a professional association representing Radiographers, Radiation Therapists and Sonographers;
3. Australian and New Zealand Society of Nuclear Medicine (ANZSNM) a professional association representing Nuclear Medicine Scientists and Technologists;
4. Medical Radiations Australia, Council of Medical Radiations Discipline Heads (MRA) a group representing Australian Universities offering Medical Radiation Sciences programs of study and;
5. The unregulated States of NSW and SA have been represented by professional association nominated stakeholders on the MRP-NSC as part of this consultation and development process.

2. **Background**

Prior to the formation of this Council, the accreditation of medical radiation sciences programs of study provided by Australian post-secondary education entities was performed by the Australian Institute of Radiography (AIR) via its Professional Accreditation and Education Board (PAEB) and the Australian and New Zealand Society of Nuclear Medicine (ANZSNM). The formation of this accreditation council builds on the existing practices of accreditation of tertiary undergraduate and post graduate programs of study and the assessment of overseas applicants for professional recognition to practise in Australia contracted by these two professional bodies by the Department of Immigration and Citizenship.

The AIR was incorporated in 1950, only a few months following the signing into existence of the College of Radiologists in October 1949. In 1952, the Conjoint Board was formed to run and accredit radiography and radiation therapy programs of study and to accredit graduates from those programs of study. The role of the Conjoint Board was taken over by the PAEB in 1986 and has continued to the present day. At the same time, the Overseas Qualifications Assessment Panel was established to provide some control over the quality of overseas radiographers seeking to work in Australia and this function was formalised through an Agreement with the Commonwealth Government in 1993 whereby all overseas trained Radiographers, Radiation Therapists, Sonographers, Nuclear Medicine Scientists/Technologists and Industrial Radiographers must apply for assessment of their qualifications directly to the AIR and the ANZSNM.

The ANZSNM 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 its involvement in training and course accreditation in 1971 a function that is continued today by the ANZSNM Accreditation Board. The ANZSNM is the Gazetted Authority for the assessment of overseas qualifications in Nuclear Medicine for the purpose of skilled migration into Australia. The ANZSNM assessment includes assessing the eligibility to undertake the accreditation examination, English language test, accreditation examination (written) and Professional Development Programme (clinical).

With the introduction of national registration, the AIR and ANZSNM acknowledge that the governing legislation requires a differently structured national entity to undertake the task of course and practitioner accreditation that builds on the knowledge, experience and expertise derived from the past work of these professional associations. The formation of the Australian Medical Radiation Sciences Accreditation Council creates an entity that effects a transition from the accreditation activity operated by the professional associations to an independent accreditation council within the meaning of the Act.

The **Australian Medical Radiation Sciences Accreditation Council (AMRSAC)** is a new organisation that will combine, harmonise and expand existing accreditation processes of the medical radiation professions. This Council represents an evolution of accreditation practices from the AIR and the ANZSNM to an independent

accreditation body. The Council will be structured to bring together the key stakeholders within medical radiation sciences (MRS) and allow for equal representation from the MRS disciplines - diagnostic, radiation therapy and nuclear medicine.

The parties working toward the creation of the Council have been tripartite:

- 1) Medical Radiation Practitioner Registration Boards of Queensland, Victoria, Western Australia, Tasmania, Northern Territory and the Australian Capital Territory (including consultation with NSW and SA representatives in the absence of Registration Boards in those States).
- 2) Medical Radiations Australia, Council of Medical Radiations Discipline Heads (MRA) representing Australian Universities offering Medical Radiation Sciences programs of study.
- 3) Professional Associations: Australian Institute of Radiography (An association representing radiographers, radiation therapists and sonographers) and the Australian and New Zealand Society of Nuclear Medicine (representing Nuclear Medicine Scientists).

The members of the MRP Steering Committee and Accreditation Working Party are working toward establishing the AMRSAC so that it can commence the process of accreditation as prescribed by the Act.

3. Name and type of company

The **Australian Medical Radiation Sciences Accreditation Council (AMRSAC)** is a company limited by guarantee with a constitution developed and agreed upon by the stakeholders who will also become members of the company.

4. Role of the Council

In 2008, the Council of Australian Governments (COAG) signed an Intergovernmental Agreement for a National Registration and Accreditation Scheme for the Health Professions (the IGA). The IGA sets out accreditation arrangements for the NRAS – most of which are enshrined in the Health Practitioner Regulation National Law Act 2009 (the National Law).

The functions of this Accreditation Council align with the requirements of the Health Practitioner Regulation National Law Act (the Act).

The Act (section 42) outlines the accreditation functions for a profession as:

- a) developing accreditation standards for approval by a National Board;
- b) assessing programs of study, and the education providers that provide the programs of study, to determine whether the programs meet approved accreditation standards;
- c) assessing authorities in other countries to decide whether persons who complete the programs of study conducted or accredited by the authorities have the skills and knowledge to practise the profession in Australia;
- d) overseeing the assessment of the skills and knowledge of overseas qualified health practitioners who are seeking registration in a health profession; and

- e) making recommendations and giving advice to a National Board about the above matters.

5. External accreditation entity

This entity has been created as an external accreditation council independent from the professional organisations and existing State Registration Boards. It has been structured to be transparent and unencumbered by external influences.

6. Independence and accountability of accreditation authorities

The AMRSAC has been structured to embrace all of the standards set by the intergovernmental agreement for the establishment, governance and operation of accreditation bodies. These standards include:

- (a) open and rigorous processes for assessing individual qualifications and courses of training;
- (b) governance arrangements that provide for input from the community, education providers and the professions;
- (c) financial viability;
- (d) mechanisms to foster collaboration across all profession specific accreditation committees; and
- (e) transparent and fair processes for reviewing codes and guidelines that impact on education and training requirements.

7. Structure of AMRSAC

It has been agreed by the stakeholders that AMRSAC will have a Board of eleven Directors - three Directors from each of the three professions (3x3) plus one Community Representative Director and one Director who is a representative of another Australian Health Sciences Accreditation Council. Observers may be appointed at the Council's discretion. See Figure 1.0

Full details of the new structure for AMRSAC are not outlined in this proposal but will continue to be developed by the appointed Board of Directors.

Figure 1.0 Proposed Distribution of Discipline-specific Practitioners, Academic, External and Community-based Board of Directors.

| DIRECTORS | Diagnostic Imaging | Radiation Therapy | Nuclear Medicine |
|---|--------------------|-------------------|------------------|
| Medical Radiation Practitioner (MRP) with current clinical experience in the practice of the named respective discipline who is eligible for registration in that discipline. | 1 | 1 | 1 |
| Medical Radiation Practitioner (MRP) with current academic experience who holds an academic university appointment and is eligible for registration in that discipline. | 1 | 1 | 1 |
| Medical Radiation Practitioner (MRP) with current accreditation, regulatory experience and/or professional standards experience who is eligible for registration in that discipline. | 1 | 1 | 1 |
| Community representative. | 1 | | |
| Representative from another Australian Health Sciences Accreditation Council . | 1 | | |
| TOTAL | 11 | | |
| Observers – as determined by the Council. | | | |

8. Consultation and Review Process

During the previous three years, the MRP-NSC has engaged in extensive consultation with the stakeholder groups to develop a tripartite accreditation council that encompass the requirements and interests of the major stakeholders, the practitioners, the professional bodies and the universities offering MRS programs.

As part of this process, other Health Accreditation Councils provided consultation to the MRP-NSC these include the;

- a) Optometry Council of Australia and New Zealand (OCANZ);
- b) Australian Physiotherapy Council (APC);
- c) Australian Pharmacy Council (APC);
- d) Australian Dental Council (ADC) and
- e) Council on Chiropractic Education Australasia (CCEA).

We also reviewed the accreditation structure and function of several other accreditation councils including the:

- a) Australian Osteopathic Council (AOC);
- b) Australian and New Zealand Podiatry Accreditation Council (ANZPAC);
- c) Australian Psychology Accreditation Council (APAC) and
- d) Council on Chiropractic Education Australasia (CCEA).

9. Agreement amongst stakeholders

As demonstrated by this joint submission, we have agreement from all the key stakeholders to progress with the formation of this new accreditation council and we intend to move to incorporation and implementation as soon as possible.

10. Funding

We have developed a budget to address the funding for AMRSAC that sees financial support provided by the existing State and Territory Registration Boards and the Professional bodies (the AIR and ANZSNM) in the start-up phase and until AMRSAC can become self funding through its accreditation activities.

11. First assignment of accreditation functions

This submission requests that the Australian Health Workforce Ministerial Council (AHWMC) appoint the Australian Medical Radiation Sciences Accreditation Council (AMRSAC) as the entity to exercise accreditation function/s for the profession under the Health Practitioner Regulation National Law Act 2009.

12. Potential roles of existing accreditation authorities until 1 July 2015

It is expected that as part of an integrated and phased introduction the AIR and ANZSNM will work with AMRSAC to ensure a seamless transition of accreditation processes through to full integration in 2015.

13. Accreditation standards and documentation

The stakeholders involved in this process are determined that accreditation and professional standards will be maintained and where possible improved. This will involve a sharing of the existing professional standards and accreditation processes and documentation. The standards promulgated by the AMRSAC will subsequently be submitted for approval by the Medical Radiation Practice Board of Australia.

14. Implementation schedule

Figure 2.0 Proposed Accreditation Implementation Schedule

| April 2011 to June 2011 | July 2011 to June 2012 | July 2012 to June 2013 | July 2013 onward |
|---|---|---|---|
| Process and Function. | | | |
| <p>Incorporate AMRSAC as a Company limited by guarantee.</p> <p>Appoint Founding Directors.</p> <p>Establish funding stream and requirements.</p> | <p>Work with the AIR and ANZSNM accreditation committees to review existing processes and documentation and finalise the new accreditation processes.</p> <p>Ensure that existing MRS program accreditation functions continue.</p> | <p>In conjunction with the AIR and the ANZSNM, the AMRSAC commences its role as external accreditation council to the MRP board.</p> <p>State board funding ceases.</p> | <p>AMRSAC is fully established as the external accreditation council.</p> |

THE AUSTRALIAN MEDICAL RADIATION SCIENCES ACCREDITATION COUNCIL (AMRSAC) AGREEMENT

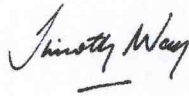
Agreement and Signatories

Following extensive consultation, the stakeholder organisations listed below have agreed to become members of the Australian Medical Radiation Sciences Accreditation Council.

The signatories to this document, on behalf of their respective entities or groups, commit to ensuring the smooth formation of the AMRSAC and the subsequent transition of accreditation functions to the AMRSAC and recommend to the Australian Health Workforce Ministerial Council (AHWMC) that the Australian Medical Radiation Sciences Accreditation Council be appointed to exercise accreditation function/s for the profession under the Health Practitioner National Law Act 2009 as the external accrediting body for Australian Medical Radiation Sciences and the Medical Radiation Practice Board of Australia.

Australian Institute of Radiography

Mr Timothy Way (President)



Date: 5/4/11

Australian and New Zealand Society of Nuclear Medicine

Dr Sze Ting Lee (President)



Date:

Conference of Regulating Authorities

Mr Neil Hicks (CORA member, Chair MRTRB of WA)



Date: 4/4/11

Medical Radiations Australia, Council of Medical Radiations Discipline Heads



Dr Kerry Thoires (Chair MRA)

Date: 4/4/11

Appendix 1

Definitions

Australian Institute of Radiography (AIR) - “the peak body representing radiographers, radiation therapists and sonographers in Australia”.

Australian and New Zealand Society of Nuclear Medicine (ANZSNM) - “is a professional organisation representing the Nuclear Medicine Industry which includes a number of professions, specifically Nuclear Medicine Scientists/Technologists” in the practice of Nuclear Medicine in Australia and New Zealand”.

Conference of Regulating Authorities (CORA) - an informal group (usually the chairs) representing the existing State and Territory Medical Radiation Practitioners Registration Boards; being:

- a) Medical Radiation Technologists Board of Western Australian
- b) Medical Radiation Practitioners Board of Victoria
- c) Medical Radiation Technologists Board of Queensland
- d) Radiation Science Professionals Registration Board of Tasmania
- e) Radiographers Board of the Northern Territory
- f) Medical Radiation Scientists Board of the Australian Capital Territory
- g) Medical Radiation Technologists Board (New Zealand).

Medical Radiations Australia, Council of Medical Radiations Discipline Heads (MRA) - “an unincorporated group representing Australian Universities offering Medical Radiation Sciences programs of study; being:

- a) Monash University
- b) RMIT University
- c) The University of Sydney
- d) The University of Newcastle
- e) Charles Sturt University
- f) The University of South Australia
- g) Curtin University of Technology
- h) Queensland University of Technology
- i) Central Queensland University.”

Medical Radiation Practitioners Accreditation and National Registration Steering Committee (MRP-NSC) - “a committee comprised of the key stakeholders in the Medical Radiation Sciences profession; being:

- a) Conference of Regulating Authorities
- b) Australian Institute of Radiography

- c) Australian and New Zealand Society of Nuclear Medicine
- d) Medical Radiations Australia, Council of Medical Radiations Discipline Heads
- e) Observers from the unregulated states of NSW and SA, nominated by the professional associations AIR and ANZSNM.”

Observer - persons or representatives of organisations invited by the Council to attend and participate in Board meetings but without any voting rights.

Professional Accreditation and Education Board (PAEB) - panel of the Australian Institute of Radiography currently responsible for recommending the accreditation of MRS programs of study in Australia.

The Australian Medical Radiation Sciences Accreditation Council (AMRSAC) - the Accreditation Council formed as the entity to exercise accreditation function/s for the profession under the Health Practitioner National Law Act 2009.