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Mr Neil Hicks
Chair
Medical Radiation Practice Board of Australia
APHRA
GPO Box 9958
MELBOURNE VIC 3001

Dear Mr Hicks

Re: Consultation Document on the Proposed Mandatory Registration Standards

I am writing to you in response to the consultation document on the Proposed Mandatory Registration Standards.

The main focus of my comments is on the registration of radiographers who carry out mammography in the BreastScreen Queensland Program. I would like to draw the Board's attention to the Return to Practice registration regimen which operates in Queensland, whereby radiographers are registered with a scope of practice restricted to the specialty area of mammography. BreastScreen Queensland has greatly benefitted from this re-entry pathway for radiographers and seeks reassurance that this will continue to be available in the future.

The other issues I would like to raise with the Board concern Continuing Professional Development (CPD) and Professional Indemnity Insurance (PII).

It is widely accepted that there is a shortage of radiographers within the BreastScreen Australia Program. Recruitment of suitable radiographers has been a problem since its establishment in 1990. There has been a steady increase in demand for radiographers to meet the screening participation rates required for an effective population based breast screening program.

BreastScreen Queensland has a training course in mammography which is accredited by the Australian Institute of Radiography (AIR) and leads to the award of a Certificate of Clinical Proficiency in Mammography (CCPM). The course provides an academic (theoretical) component and a clinical (practical) component. Knowledge and skills are assessed and clinical supervision is provided. It is usually completed over a 12 month period.

Queensland Board Registration – Mammography Scope of Practice

In 2003 BreastScreen Queensland approached the Medical Radiation Technologists Board of Queensland (MRTBQ) to explore the legislative environment for return to practice pathways for

radiographers. After discussion with the MRTBQ a pathway for returning radiographers who had been out of clinical practice for extended periods was developed and initiated. These radiographers undertake the academic and clinical components of the BreastScreen Queensland Mammography Training Course for Radiographers as per the AIR eligibility requirements for the award of a CCPM.

During this training period conditions applied to their registration in Queensland are:

- Practice of the profession restricted to the practice of mammography within BreastScreen Queensland;
- Enrolment in the BreastScreen Queensland Mammography Training Course for Radiographers. (On successful completion of the course and eligibility to apply for the AIR CCPM, practice of the profession is restricted to the practice of mammography).

On successful completion of the program the condition applied to their general registration is:

- Practice of the profession is restricted to the practice of mammography

Registration issues for consideration by the Board

- Transition to national registration in 2012 of radiographers in Queensland with general registration conditioned to (a) training and practice of mammography in BreastScreen Queensland or (b) the practice of mammography.
- Continuation of the BreastScreen Queensland re-entry pathway and training program for radiographers wishing to return to the workforce and access to a similar pathway in other jurisdictions. AIR accredited courses are available in other states.
- Continuation of mammography as a scope of practice specialty area for those radiographers with qualifications listed in Schedule 1 beyond the proposed grandparenting registration deadline of 1 July 2015.
- Inclusion of special provisions to enable this re-entry and training pathway under the Recency of Practice Registration Standard.

Continuing Professional Development

Another focus of the return to practice program within BreastScreen Queensland has been an emphasis on part time work opportunities.¹ There are currently 125 radiographers employed in BreastScreen Queensland with almost 60 percent of these choosing to work on a part time basis and most not working in other areas of Medical Imaging. Working on a part time basis may make it difficult to meet the proposed requirement of completing a minimum of 60 hours of CPD activities over a three year cycle. The AIR has set the CPD requirement for the renewal of the CCPM at 5 hours per year.

CPD issue for consideration by the Board

- A minimum CPD requirement of 5 hours per year for radiographers registered with a scope of practice limited to mammography.

Professional Indemnity Insurance

Based on input sought from Queensland Health and as applies to the ten health professions already part of the National Registration and Accreditation Scheme, Queensland Health employees who are properly credentialed and operate within their professional scope of practice meet the PII standards

¹ Understanding the Challenges Facing BreastScreen Australia in Recruitment and Retention of Radiographers. Department of Health and Ageing 2000.

required by the National Boards. A specific PII policy for public sector employees is not required. It is anticipated that the same provision would apply to the Medical Radiation Profession.

PII issue for consideration by the Board

- Provision of the same indemnity arrangements for Queensland Health radiographers as applies to the ten health professions that have already transitioned to National Registration.

If you require any additional information please call (07) 3328 9437 or email Jennifer_Muller@health.qld.gov.au.

Yours sincerely



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07 / 10 / 11