

**Submission on behalf of the  
Australian and New Zealand Society  
of Nuclear Medicine  
(ANZSNM)**

**Draft Provisional Registration Guideline of the  
Medical Radiation Practice Board of Australia  
(MRPBA)**



## **Introduction:**

The ANZSNM is the national professional organization representing professionals from all disciplines involved in the field of Nuclear Medicine. It is the current professional body for Nuclear Medicine Technologists/Scientists in Australia, with approximately 80% of working practitioners being members, and these form the ANZSNMT.

With the transition to a National Board, the ANZSNM and ANZSNMT recognize the need for greater transparency and the issues outlined in the draft standard. Although our preferred option is for things to remain "As is", we understand this may not be possible. With this in mind, the ANZSNM would be happy to work with the MRPBA to develop guidelines for provisional registration that meet the requirements of the National Board (Option 3) as proposed in the consultation documents.

### **Question 1:**

**Should eligibility for provisional registration be directly related to:**

- a) the amount of clinical training undertaken in the registrants course of study, and/or**
- b) attainment of entry level professional capabilities by the registrant?**

The ANZSNM believe that eligibility for provisional registration should be related to both (a) and (b). There is significant difference between the clinical experience obtained as a student and as a PDY. There will be some activities that a student is unable to undertake during clinical placement, that occur during the period of supervised practice. These would include essential competencies such as Hot Laboratory duties, Intravenous cannulation, administration of radiopharmaceuticals and administration of Radionuclide therapies. These are also the areas of greatest medico-legal risk for Nuclear Medicine Technologists.

### **Question 2:**

**What mechanisms should the National Board use to determine if practitioners are required to undertake supervised practice? For example: demonstration of competence and/or amount of clinical training undertake in a program of study?**

We strongly feel that all Australian university graduates wishing to obtain registration as Nuclear Medicine Technologists MUST complete a period of supervised practice. This includes graduates from the 4-year programs and Graduate Entry Masters Programs, as well as the traditional 3-year programs.

This should be measured against a scope of practice developed by the professional associations in conjunction with clinical practitioners and the universities. This document should outline the minimum competencies required to work as a Nuclear Medicine Technologist with full general registration.

**Question 3:**

**Should a minimum period of clinical training with a program of study be specified within this guideline, and if so, what would be an appropriate minimum period?**

The ANZSNM feel that the appropriate minimum period should be based on the number of clinical hours completed as part of the university program of study, in conjunction with their ability to perform all minimum competencies required to work independently as defined within the scope of practice.

This total should cover 48 weeks of clinical placement (1824 hours) and be followed by an assessment of competence. It should apply to graduates of all programs of study including 3-year, 4-year and Graduate Entry Masters programs.

**Question 4:**

**Should National Board require all graduates to undertake a program of supervised practice prior to general registration?**

The ANZSNM strongly feel that all Australian university graduates wishing to obtain registration as Nuclear Medicine Technologists **MUST** complete a period of supervised practice. This includes graduates from the 3-year, 4-year and Graduate Entry Masters programs. However, the time required to achieve the essential minimum competencies for full general registration may vary between the program types due to differing amounts of clinical time.

In early 2010 the ANZSNM commissioned a review of our current PDY program. The results of this review were submitted in March 2011 and supported a period of supervised practice for all graduates at the completion of studies. This review is attached as a separate document to this submission.

**Question 5:**

**Are there other areas where provisional registration should apply?**

Provisional registration should be applied to those with overseas qualifications and for practitioners with issues of recency of practice (greater than 3 years without clinical practice).

**Question 6:**

**Does the issuance of a guideline articulate the National Board's requirements with sufficient clarity?**

There is concern that there is no reference to scope of practice requirements for each of the professions. Scope of practice should be recognized by the National Board as the minimum standard required to be issued full general registration. The ANZSNM scope of practice document is currently in the process of being updated to best represent current practice.

**Question 7:**

**What is the likely impact of this on individual registrants?**

There should be no impact on individual registrants, as at present all graduates are required to complete a period of supervised practice.

**Question 8:**

**Are there jurisdiction-specific impacts for practitioners, or governments or other stakeholders that the National Board should be aware of, if this document were approved?**

Registrants are required to comply with State-based Radiation Control Acts and licensing requirements. These vary between states and would need to be taken into account.

There are also issues surrounding grading and pay structures that vary from state to state. At present, an increase in grading is often obtained after completing a 1 year supervised practice program (in both NSW and Vic). It may be that there is a push for this increase in pay and grading to become linked to obtaining full general registration.

**Question 9:**

**Is November 1 2013 a suitable date for implementation, should the registration be approved by Ministerial Council?**

November 1 2013 is a suitable date, provided that Scope of Practice documents have been clearly defined. The date will accommodate those graduating from university in 2013.

**Question 10:**

**Are there other implementation issues that the National Board should be aware of?**

Communications with all the stakeholders including workplaces, universities and provisional registrants must be clear and readily available to ensure smooth transition to the program.