



Townsville
Hospital and Health Service

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To Whom It May Concern:

Draft *Provisional* registration guideline

Upon reviewing the draft *Provisional registration guideline* issued in the February 2013 newsletter I submit the following response.

With respects to the specific questions asked by the board I give the following responses:

1. Eligibility for provisional registration should be mandatory for all qualifications within the field of MRS to limit the inappropriate use of graduates with limited experience and to promote a National standard of practice. The length of which however may be determined by prior clinical placement. The successful completion of which must include a National Board exam.
2. Mandatory for all.
3. Yes there must be a minimum standard of clinical hours within each program, with perhaps a pro-rata amount deducted from the 48 week programs once the hours within the degree have exceeded those of the three year degree.
4. Yes
5. International relocation of professional excluding short term locum positions.
6. If it specifically states that's all domestic graduates and international employees are subject to supervised practice.
7. A higher level of competence and understanding of their respective professions.
8. None that I'm aware.
9. Yes
10. No

It is from the background of acting Preceptor within Townsville Hospital and Health Service, Radiation Oncology that I make the assessment on current qualifications that are available within Medical Radiation Science, specifically regarding Radiation Therapy, and make the following suggestion.

There stand currently three methods of qualification within Radiation Therapy:

1. Three Year Undergraduate Degree – Newcastle University, Queensland University of Technology, RMIT
2. Four Year Undergraduate Degree – University of South Australia
3. Two Year Postgraduate Masters – University of Sydney, Monash University

Currently the supervised practice program is only mandatory for the three year undergraduate program, with both the four year and postgraduate programs circumventing this requirement due to the amount of clinical time offered within each course. The proposal to offer supervised practice to all graduates is a good one however determining the period of required supervision is difficult. Unfortunately this alone does not insure that all graduates are meeting a National standard.

I propose that an effective Board exam drawing on a mixture clinically acquired knowledge, academic theory and problem solving skills would be a necessary addition within simulation, treatment and dosimetry. This method is used by the Canadian Association of Medical Radiation Technologists and I believe it is successful in quantitatively assessing basic requirements for Radiation Therapists. The exam would be sat following a period of supervised practice, the length of which would be dependant on previous clinical placement. For example the current three year undergraduate program would still consist of forty-eight weeks of supervised practice, the four year undergraduates and postgraduates may only require 6 months or less. Issuing an exam in multiple choice and short response will limit the subjective nature of competency based assessments and provide a National standard of which at this time does not exist despite the best efforts of Universities to agree on a competency marking criteria.

If the Board can successfully mandate both supervised practice and a exam to practice great strides for the continued prosperity of professions with Medical Radiation Sciences and the continuation of high level patient care.

Yours Sincerely,

Shannon Robards
**Acting Preceptor,
Radiation Oncology**