

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

**Review Registration standards for Professional
Indemnity Insurance 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.

The ANZSNMT submit the below comments on the revised registration standard on behalf of the members.

1. From your perspective, how is the current registration standard working?

The society believes that the current standard may be confusing to some practitioners who have a limited understanding of professional indemnity insurance. A better definition of run-off cover and the other types of cover required should be included in the revised standard.

2. Is the definition of clinical practice suitable or should it also include the provision of advice to other practitioners?

The definition of clinical practice is clear and applies to only those employed in a clinical environment in which they are providing a nuclear medicine service to patients.

3. Is the content and structure of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?

The revised registration standard has been written in a style that is easier to read and understand. The definitions for each type of claim are helpful and relevant to all practitioners. However the definition of 'appropriate run-off' needs to be better clarified especially for those working in paediatrics for which the time to put forward a legal case is longer. Perhaps it should include a prescribed number of years

4. Is there any content that needs to be changed or deleted in the draft revised registration standard?

The proposal in option 2 mentions that the revised registration standard will only apply to 'those in 'clinical practice'. This is not clearly stated in the document and requires the practitioner to have read and understood the revised definition of 'clinical practice'.

5. Does the proposed five year maximum period within which to undertake a review of the standard provide a reasonable balance between stability and flexibility required to revise and update the standard if necessary?

The proposed 5 year review period seems reasonable.

6. Is there anything missing that needs to be added to the draft revised registration standard?

The draft revised document outlines the information needed to comply with the Professional Indemnity registration standard mandated under National Law.

7. Do you have any other comments on the draft revised registration standard?

No further comments. The society is supportive of implementing Option 2 as proposed by the board, taking into consideration the above outlined suggestions.

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

**Review Registration standards for Continuing
Professional Development 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 70% of working practitioners being members, and these form the ANZSNMT.

The ANZSNMT submit the below comments on the revised registration standard on behalf of the members.

1. From your perspective, how is the current registration standard working?

The society believes that the existing standard works well and outlines the requirements for CPD. However better clarity is needed for dual-qualified practitioners, the amount of CPD hours that should be substantive and general and examples of what could be considered substantive and general.

2. Are the proposed requirements for registrants to undertake specific CPD activities appropriate?

The proposed specific CPD activities are appropriate and clearly defined. They seem reasonable for the situations outlined.

3. Is the change to who is required to meet the standard appropriate?

The society are supportive of the MRPB mandating CPD for provisional registrants and believe that this will assist with their learning and professional development.

4. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?

The proposed draft registration standard better defines the amount of CPD hours that must be substantive and the examples used for each category are clear, helpful and easy to interpret.

5. Is there any content that needs to be changed or deleted in the draft revised registration standard?

The society supports the changes to the CPD standard and the revisions made to the document.

6. Does the proposed five year maximum period within which to undertake a review of the standard provide a reasonable balance between stability and the flexibility required to revise and update the standard if necessary?

The proposed 5 year review period seems reasonable.

7. Is there anything missing that needs to be added to the draft revised registration standard?

The revised standard outlines the requirements for CPD and provides relevant examples of how to achieve the 60 hours over a 3 year period.

8. Do you have any other comments on the draft revised registration standard?

No further comments. The society is supportive of implementing Option 2 as proposed by the board, taking into consideration the above outlined suggestions.

9. What specific requirements in addition to those listed in “what must I do’ should the Board require to approve a CPD program?

It may be helpful to include the minimum number of hours that are required to be substantive i.e. 30 hours in part b (i).

10. Is the information provided in the guideline clear and useful?

The information included in the guideline is clear and concise, with examples provided for each of the activities.

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

**Review Registration standards for Recency of
Practice 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.

The ANZSNMT submit the below comments on the revised registration standard on behalf of the members.

1. From your perspective, how is the current registration standard working?

The society believes that the existing standard works well and outlines the requirements for recency of practice. The increase in hours required to maintain recency of practice seems appropriate and will need to be made clear to any applicants

2. Is the definition of clinical practice appropriate for the purpose of demonstrating recency of practice?

The definition of clinical practice is clear and applies to only those employed in a clinical environment in which they are providing a nuclear medicine service to patients.

3. Is the requirement for 450 hours of practice in the past three years sufficient for practitioners to competently and safely provide services to the public?

The increase in hours to 450 hours in the past 3 years seems adequate to ensure that the practitioner maintains a reasonable skill set. It is not clear as to whether there is a minimum number of hours per year required or if this can be done as a single clinical placement any time in the last 3 years. Each case will need to be reviewed on its own merit.

4. Is the content of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?

The revised registration standard has been written in a style that is easier to read and understand. The guidelines that outline the hours of experience based on the time since last practice are helpful and relevant, allowing the practitioner to assess their individual situation.

5. *Is there any content that needs to be changed or deleted in the draft revised registration standard?*

The society supports the changes to the Recency of Practice standard and the revisions made to the document.

6. *Does the proposed five year maximum period within which to undertake a review of the standard provide a reasonable balance between stability and the flexibility required to revise and update the standard if necessary?*

The proposed 5 year review period seems reasonable.

7. *Is there anything missing that needs to be added to the draft revised registration standard?*

The revised standard outlines the requirements for recency of practice and clearly defines the assessments that may be required by the board following individual review of each case.

8. *Do you have any other comments on the draft revised registration standard?*

No further comments. The society is supportive of implementing Option 2 as proposed by the board, taking into consideration the above outlined suggestions.

9. *Is the information provided in the guideline clear and useful?*

The information included in the guideline is clear and concise, with a clear definition of the requirements based on the time since last service.