

Public consultation paper

Development of national examination guidelines

You are invited to provide feedback

To provide feedback please submit your comments **in a Word document** by email to medicalradiationconsultation@ahpra.gov.au **by 6pm (AEDST) Friday, 16 October 2015**.

The Board's preference is for feedback to be submitted using the feedback form provided.

Public consultation

The Medical Radiation Practice Board of Australia (the Board) is releasing the attached consultation paper on national examination guidelines. You are invited to provide your comments on the consultation paper, including the questions in the paper, by 16 October 2015.

How your submission will be treated

Submissions will generally be published unless you request otherwise. The Board publishes submissions on its website to encourage discussion and inform the community and stakeholders. However, the Board retains the right not to publish submissions at its discretion, and will not place on its website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the Board will remove personally-identifying information from submissions, including contact details. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Board.

The Board also accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982 (Cth)*, which has provisions designed to protect personal information and information given in confidence.

Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

Please note: paragraph numbering is provided to assist with ease of reference during consultation.

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Executive summary

1. The Medical Radiation Practice Board of Australia (the Board) is consulting on draft *National examination guidelines*.
2. The purpose of the examination is to provide an objective measure of an individual's capacity to demonstrate the minimum applied knowledge necessary for general registration. The examination is based on the [Professional capabilities for medical radiation practice](#), which describe the entry level professional capabilities for the three divisions of medical radiation practice.
3. The draft *National examination guidelines* provide information and guidance to individuals who may be required to undertake an examination either before being registered by the Board or where provision is made for an examination or assessment in an approved registration standard¹.

Discussion

Background

4. In December 2013 the Board published *Professional capabilities for medical radiation practice*. The capability statements identify the minimum knowledge, skills and professional attributes necessary for safe, independent practice in the divisions of diagnostic radiography, nuclear medicine technology and radiation therapy. In order to be granted general registration, a medical radiation practitioner must demonstrate that they meet the *Professional capabilities* for practice in the profession.
5. Approved programs of study undergo accreditation and periodic monitoring to ensure that the education provider and the approved program continue to meet the accreditation standards. Graduates of approved programs of study will meet the *Professional capabilities for medical radiation practice* through the application of [approved accreditation standards for the medical radiation practice profession](#).
6. In April 2014 the Standing Council on Health, meeting as the Australian Health Workforce Ministerial Council, approved the [Supervised practice registration standard](#) for the medical radiation practice profession. The standard includes a provision that allows the Board to require a supervised practitioner to 'undertake an examination or assessment approved by the Board'.
7. The purpose of the *National examination guidelines* is to provide information and guidance to practitioners who are required to sit an examination. The guidelines provide information in relation to:
 - the format and requirements of the examination
 - the capabilities required to satisfy the requirements of the examination
 - preparing for the examination
 - suggested reading lists for the examination
 - examination rules, and
 - how examination results may be used by the Board.

When a practitioner will be required to sit an examination

8. The Board may require a practitioner to sit an examination where:
 - its use is permitted by the *Health Practitioner Regulation National Law*, as in force in each state and territory (the National Law), or
 - it is part of an approved registration standard.

¹ For general registration see section 52(b)(b)(ii) of the National Law

9. The [regulatory principles for the National Scheme](#) guide the Board in its decision-making, including decisions where a practitioner, or class of practitioners, may be required to undertake an examination.
10. As indicated above the *Supervised practice registration standard* allows the Board to use an examination in the context of supervised practice.
11. For those holding provisional registration and undertaking supervised practice the Board will use an examination where there are concerns about a practitioner's capacity to practise safely while under supervision. For example a supervisor has reported concerns about a supervised practitioner or assessment reports show that a supervised practitioner is failing to progress.
12. **Importantly**, the Board does not intend to use the examination as a general assessment mechanism for individuals that hold a qualification for general registration² (which includes practitioners who are granted provisional registration).

An examination will be used where specific circumstances require a more detailed and objective assessment of a practitioner's capability to practise in the profession.

13. The *Supervised practice registration standard* applies to a number of different types of registration including, limited registration and provisional registration. It also applies to specific circumstances where supervised practice is used to assist practitioners to return to practice (in the context of recency of practice) or as an adjunct for some overseas qualified practitioners commencing practice in Australia for the first time.
14. Given the breadth of application for the *Supervised practice registration standard* the Board may also consider using an examination, in the context of supervised practice where
 - a practitioner is not qualified for general registration under section 53 of the National Law (e.g. limited registration), or
 - for practitioners who are required to undertake a period of supervised practice because they are returning to practice after a prolonged absence .
15. In May 2014, during [public consultation](#) on the Board's review of the *Recency of practice registration standard*, the Board proposed to include the use of examination for those practitioners returning to practice after an extended break from practice. The traditional approach to remedying long-term absences from professional practice has been to require the practitioner to undertake further study, or in some cases, 're-qualification'. The examination is an alternative method of competence assurance that allows practitioners to demonstrate the *Professional capabilities* necessary for practice while reducing the time and cost barriers associated with the traditional approach.

Delivery of examination

16. The national examination will be delivered through an 'online' environment in a supervised exam centre. The online delivery offers a number of benefits over the more traditional pen and paper model of exams. However, like any online transaction security arrangements, including practitioner identity and information exchange between the host and the exam centre, are critical to ensuring the integrity of the process.
17. The exam will be held in approved exam centres located predominantly in capital cities around Australia. The exam will be overseen by an examination supervisor or 'invigilator' whose role is to verify the identity of the practitioner taking the exam and to ensure that the instructions specified by the Board are carried out.

² In order to be *eligible* for provisional registration a practitioner must be *qualified* for general registration see section.62(1)(a) of the National Law

The examination

18. As indicated above, the examination is based on the *Professional capabilities for medical radiation practice*. Practitioners will be able to apply to sit the examination that is relevant to their division of registration – diagnostic radiography, radiation therapy, or nuclear medicine technology. The exam will consist of between 150 and 200 questions and will be conducted over 3.5 hours (210 minutes).
19. About 50 per cent of questions will come from the practice area relevant to the division of registration, that is:
 - Domain 5a Diagnostic radiography questions, or
 - Domain 5b Nuclear medicine technology questions, or
 - Domain 5c Radiation therapy questions.
20. The other 50 per cent of questions will come from Domains 1-5 (not including 5a, 5b, 5c) which are common capabilities for medical radiation science. Questions will not be distributed evenly across domains, for example, there will be a greater focus on radiation safety (Domain 4) than other domains.

Use of examination results

21. The Board will use examination results as a basis for making a range of regulatory decisions including:
 - whether to grant or renew registration
 - whether to impose conditions
 - whether to refuse registration or renewal of registration, or
 - whether to remove conditions.
22. Practitioners will have three opportunities to sit the examination. If a practitioner has not passed the examination after the third attempt the Board is of the general view that the practitioner is not able to apply foundational knowledge and concepts to the minimum level required for safe practice. If the Board proposes to decline an application for registration or renewal of registration from a practitioner who has failed the examination three times, the practitioner will have an opportunity to make a submission before the Board's decision is made.

Options statement

23. The prime objective of the National Law is to provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered³. The National Law makes specific provision and reference to an examination and its use by the Board intends to meet other objectives of the National Law by:
 - ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered
 - providing a rigorous and responsive assessment of overseas-trained health practitioners, and thereby,
 - facilitating access to services, and
 - facilitating a flexible, responsive and sustainable Australian health workforce.

The Board has considered a number of options in developing this proposal.

Option 1 – Do nothing.

24. Under this option the Board would provide no information or only provide limited guidance for practitioners.

³ Section 3(2)(a) of the National Law – Objectives and guiding principles

Option 2 – Develop a guideline

25. Under this option the Board would provide information and guidance to practitioners about the format and requirements of the examination, the capabilities required to satisfy the requirements of the examination, preparing for the examination (including a suggested reading list), examination rules and how examination results may be used by the Board to make decisions on registration.
26. The National Law requires a Board to undertake wide-ranging consultation when developing a guideline.

Preferred option

Option 2 – Develop a guideline.

Estimated impacts of the draft guideline

27. The approved *Supervised practice registration standard* for medical radiation practice includes a provision that allows the Board to require an examination. The Board estimates that the guidelines represent a minimal regulatory impact for practitioners and the public.
28. The Board does consider, however, that guidelines provide a substantial benefit to individual practitioners who are required to sit an examination.

Analysis of options

Potential benefits and costs of the proposal

29. The benefits of the preferred option are that it:
 - provides clarity for practitioners who are required to sit an examination
 - works from a single minimum benchmark for general registration
 - ensures practitioners possess a threshold level of knowledge, skills and professional attributes regardless of the pathway to registration, and
 - provides clarity about how the results impact on decisions relating to a practitioner's registration or renewal of registration.
30. The costs of the preferred option are:
 - There will be an additional cost to the applicant to sit the examination over and above the usual costs relating to an application for registration in Australia.
 - The costs of developing an examination are significant. The Board will subsidise about two thirds of the costs of the exam. Those required to sit the exam will pay a fee that represents about one third of the examination costs. This will translate to a fee of between \$500 and \$700.
 - The costs of the examination include the infrastructure costs, service provisioning costs and question development costs.

Relevant sections of the National Law

Section 3

Section 49

Section 52

Section 53

Section 66

Section 72

Health Practitioner Regulation National Law (as in force in each state and territory)

Queensland	Health Practitioner Regulation National Law Act 2009 From 1 July 2014: Ombudsman Act 2013
New South Wales	Health Practitioner Regulation National Law (NSW) No 86a
Victoria	Health Practitioner Regulation National Law (Victoria) Act 2009
Australian Capital Territory	Health Practitioner Regulation National Law (ACT) Act 2010
Northern Territory	Health Practitioner Regulation (National Uniform Legislation) Act 2010
Tasmania	Health Practitioner Regulation National Law (Tasmania) Act 2010
<u>South Australia</u>	Health Practitioner Regulation National Law (South Australia) Act 2010
Western Australia	Health Practitioner Regulation National Law (WA) Act 2010

Questions for consideration

31. The Board is inviting feedback on the following questions:
1. Do the draft *National examination guidelines* provide clear guidance for practitioners?
 2. Is the content of the draft guidelines helpful, relevant and workable?
 3. Is there any content that needs to be changed or deleted in the draft guidelines?
 4. Are there other requirements that need to be included in the draft guidelines?
 5. Are there any relevant impacts for practitioners, governments or other stakeholders that the Board should be aware of?
 6. Do you have any other comments on the draft guidelines?

Draft

Effective from: <<date>>

Review date: <<date>>

National examination guidelines

Introduction

32. These guidelines and specifications have been prepared to assist candidates for the Medical Radiation Practice Board of Australia examination. The guideline contains information about:

- the format and requirements of the examination
- the capabilities required to satisfy the requirements of the examination
- preparing for the examination
- suggested reading lists for the examination
- examination rules, and
- how examination results may be used by the Board.

For more information candidates should refer to the *National examination* section of the Board's website.

Assuring capability to practise

33. The national examination is based on the Board's *Professional capabilities for medical radiation practitioners* which are the capabilities required of entry level practitioners, demonstration of which is necessary for *eligibility* for general registration.

34. The examination is constructed from a blueprint based on the *professional capabilities* and is designed to assess a practitioner's:

- ability to review critically, analyse, consolidate and synthesise knowledge
- ability to differentiate theoretical concepts, to exercise critical thinking and judgement in identifying and solving problems
- initiative and judgement in planning, problem solving and decision-making in professional practice
- capacity to analyse a range of circumstances encountered in clinical practice, and evaluate options to maximise patient care
- capacity to adapt knowledge and skills in diverse contexts, and
- accountability for professional practice and inter-professional practice.

When the Board may require an examination

35. The examination will support effective improvement in the quality and integrity of decision-making when assessing applications for general registration as a medical radiation practitioner.

36. The Board may require a practitioner to sit an examination where:

- its use is permitted by the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), or
 - it is part of an approved registration standard.
37. The [regulatory principles for the National Scheme](#) guide the Board in its decision-making, including decisions where a practitioner, or a class of practitioners, may be required to undertake an examination.
38. **Importantly**, the Board does not intend to use the examination as a general assessment mechanism for practitioners that are *qualified*⁴ for general registration (which includes those practitioners who are granted provisional registration). The examination is intended to be used where specific circumstances require a more detailed and objective assessment of a practitioner's capability to practise in the profession. The Board will consider using an examination where:
- a practitioner is not *qualified* for general registration under section 53 of the National Law
 - there are concerns about a practitioner's capacity to practise safely while under supervision, or
 - an approved registration standard makes provision for an examination.
39. Medical radiation practitioners registered with the New Zealand Medical Radiation Technologists Board who hold a current practising certificate, and who apply for general registration, are exempt from sitting the examination in line with the requirements of the Trans-Tasman Mutual Recognition arrangement.
40. The examination will be used to establish a form of equivalence in professional capability to practise, and therefore meet the *qualification* requirements for general registration under section 53 of the National Law. The capability required for professional practice is a multi-faceted concept that requires a holistic approach, as such there may be other *eligibility* criteria (apart from a qualification) required for general registration.

Structure of the examination

41. The exam is a computerised multiple choice question (MCQ) format. The multiple choice question format is a form of assessment in which respondents are asked to select the best possible answer out of a number of choices.
42. The exam is three hours (180 minutes) long. However, candidates are required to be available for a total of four hours to complete registration procedures, a pre-testing phase and post-examination administration activities.

The examination will contain up to 200 questions that can be separated into two broad categories:

- about 50 per cent of questions will come from the practice area relevant to the division of registration, that is:
 - Domain 5a Diagnostic radiography questions, or
 - Domain 5b Nuclear medicine technology questions, or
 - Domain 5c Radiation therapy questions
 and,
 - about 50 per cent of questions will come from Domains 1-5 (not including 5a, 5b, 5c) which are common capabilities for medical radiation science.
43. Questions will not be evenly distributed across domains, for example, in any examination, there may be more questions from Domain 4: Radiation safety and risk management, than another domain.
44. The exam will include questions related to all levels of the human lifecycle including *in-utero*, neo-natal, paediatric, adult and older adult. Exam questions will reflect health situations relevant to all these phases of the human lifecycle.

⁴ See section 53 of the National Law for a description of qualifications for general registration

Exam questions are mostly in the format of:

- single topic questions, or
- a vignette or clinical scenario.

45. All questions have four options, of which one is the correct answer and three are incorrect. The correct answers are determined by the National Examination Committee. The correct answer is the best, or most correct option, in the view of the committee. The National Examination Committee reviews all questions for content validity and analyses their statistical reliability, which provides the basis for further question development and improvement.

Standard of the examination

46. The national exam is based on the Board's published *Professional capabilities for medical radiation practitioners*. The *Professional capabilities* set entry-level requirements medical radiation practice and form part of eligibility requirements for general registration. These eligibility requirements are relevant to

- practitioners qualified in Australia
- practitioners who qualified overseas
- practitioners requiring remediation, and
- practitioners returning to practice.

47. The *Professional capabilities* identify the minimum knowledge, skills and professional attributes necessary for practice. During professional practice it is expected that practitioners will demonstrate elements from a number of capability domains in any given circumstance. This recognises that competent professional practice is more than a sum of each discrete part. It requires an ability to draw on and integrate the breadth of capabilities to support overall performance.

48. To demonstrate capability, a candidate must apply their knowledge holistically to a clinical problem or appropriately manage the clinical environment.

49. The professional capability of graduates from approved programs of study is assessed over several years in a variety of ways. For those practitioners who have not completed an approved program of study the Board uses an examination to evaluate the candidate's capacity for applying knowledge and clinical reasoning.

Professional capabilities for medical radiation practice

50. As indicated above, the *professional capabilities* identify the minimum knowledge, skills and professional attributes necessary for safe, independent practice in diagnostic radiography, nuclear medicine technology and radiation therapy. In order to be granted general registration, a medical radiation practitioner must be able to demonstrate these capabilities.

51. The capabilities have been grouped into domains which identify elements of practice. The domains for the professional capabilities for medical radiation practice are:

- Domain 1: Professional and ethical conduct
- Domain 2: Professional communication and collaboration
- Domain 3: Evidence-based practice and professional learning
- Domain 4: Radiation safety and risk management, and
- Domain 5: Practice in medical radiation science (common), and either:
 - Domain 5a: Practice in diagnostic radiography
 - Domain 5b: Practice in nuclear medicine, and
 - Domain 5c: Practice in radiation therapy.

52. Competent professional practice requires an ability to draw on and integrate the breadth of capabilities during the usual course of practice. For this reason the examination will investigate a practitioner's capacity to apply elements from a number of domains to gather information, establish the clinical question, consider evidence and intuit, conclude or devise a plan to answer or resolve the clinical question.

The [Professional capabilities for medical radiation practitioners](#) can be found on the Board's website.

Preparation for the examination

53. Medical radiation practitioners with little or no recent study or practice are likely to have difficulty with the examination.
54. Candidates for the examination should:
1. read and understand the requirements of the *Professional capabilities for medical radiation practitioners*
 2. review the reading and resource list included at **Appendix A** and use these resources in conjunction with the *Professional capabilities for medical radiation practitioners*
 3. develop a program of revision of academic and professional literature that aims to meet the *professional capabilities* requirements, and.
 4. attempt the practice exam

Examination rules

55. All formal examinations have rules in relation to their conduct. More information on examination rules is available on the Board's website. However, there are some rules that, if breached, would have a significant impact on the candidate's future capacity to be or remain registered.
56. Before sitting the examination, candidates will be required to agree to a set of terms and conditions regarding the examination, including keeping the content of the examination and questions confidential.
57. Candidates will not be permitted to take into the examination venue or to use any reference material (electronic or hard copy) during the examination. Mobile phones and other equipment must not be taken into the examination. Access to the Internet will not be permitted in the examination rooms or in the examination waiting areas.

Breach of the code of conduct

58. Candidates sitting an examination are subject to the usual rules of ethical and professional conduct.
59. Failure to comply with the rules of an examination or any instruction of the invigilator may be regarded as a breach of professional conduct.
60. A notification may be made against a candidate sitting an examination by any person, including an exam invigilator.
61. The Board regards misconduct during an examination as a serious matter. Falsifying results, fraudulent or dishonest conduct in connection with an examination has the potential for practitioners who are not qualified or not otherwise competent and safe to practise, to be improperly registered. In such cases the Board will consider any complaint and may refer the matter to a responsible tribunal. If a tribunal finds a complaint sustained it may make a range of orders including cancellation of registration and disqualifying a person from applying for registration for a specified period.

Meeting identification requirements

62. Examination centres will require each candidate to provide two forms of identification, one of which must be a government issued photo identification. To satisfy the identification requirements an invigilator may ask you to produce additional photographic identification. You should therefore consider bringing more than one form of photographic identification, from a reputable source, to establish your identification.
63. Where an invigilator has a reasonable concern about your ability to properly establish your identify or there is a concern that identity documents are being misused, you will be refused access to the exam.

64. Fraudulent use of identity documents is a serious matter and may be referred to police.
65. If you are refused access to the exam you will forfeit the fees paid to sit the examination.

Scoring the examination

66. The examination operates as a pass/fail examination, with the pass mark set that ensures practitioners adequately meet the Board's *Professional capabilities for medical radiation practitioners*. All questions are of equal value. There is no weighting of questions in terms of their contribution to the candidate's overall examination mark.
67. The passing score is determined by the Board's National Examination Committee (NEC) prior to each exam and is set in order to ensure that a passing score ensures that candidates are safe to practice.
68. When setting the passing score, the NEC considers other data, including statistical and performance data, to ensure the standard that candidates must achieve is fair, valid and consistent with the principles and objectives of the National Law.
69. The passing score may be adjusted after the conduct of examination. For illustration purposes only - on occasion a particular question and its answer (and/or distracters) may have become impossible to use accurately. This may be due to the grammar or expression used, or, on review, there is more than one reasonable answer for a question. In these circumstances a question may be removed from the exam and marks for all examinees adjusted accordingly.

Previous exam papers

70. Previous exam papers will not be made available.

Practice examination

71. A practice exam is available for registered practitioners who have registered and paid to sit an examination. The practice exam is a sample set of questions that provides candidates with a sense of how the exam is structured, the types and style of questions and how exam time will need to be managed.

Examination results

72. Practitioners will have three opportunities to pass the examination. If you have not passed the examination on your third attempt the Board is of the general view that you are not able to apply foundational knowledge and concepts to the minimum level required for safe practice. If the Board proposes to decline your application for registration or renewal of registration you will have an opportunity to make a submission.

Special consideration

73. Special consideration is available to candidates who are unable to sit or complete an examination due to exceptional circumstance beyond their control. Candidates may be given an opportunity to re-sit the examination at the next available date without incurring additional examination fees.

For more information, please refer to the *National examination* section of the Board's website.

Board may refuse to grant or renew registration

74. The examination is set at the minimum capabilities level for safe practise in the profession. The Board may refuse a new application or an application to renew registration for postgraduate training or supervised practice for any of the following reasons:
 - you have not attempted the examination at least once in the same period of registration
 - you have failed an examination or assessment on at least three occasions
 - you have engaged in misconduct in connection with an examination, or
 - you have not met all other requirements of the National Law.

Appendix A: Suggested reading and resources list

75. You are required to manage your own preparation for the examination. Part of that preparation will often include reading and revising academic textbooks and other professional resources. The reading and resources list provided below are suggested items, and are intended as a guide only.

The list of suggested items provides a good cross section of academic and professional material, but it is not an exhaustive list. When searching for other reference and resource material, you should take care to ensure that the material is relevant to current professional practice. You should also be aware that there are specific legal and practice regimes in Australia. Please take care when using resources that reference overseas laws, regulatory requirements or specific practice requirements as they may differ from practice in Australia.

The list of resources will be provided with any published version of these guidelines.

<<< The list of suggested academic and professional textbooks and resources will be updated from time to time >>>

Statement of assessment

Board's statement of assessment against AHPRA's Procedures for the development of registration standards, codes and guidelines and COAG Principles for best practice regulation

National examination guidelines

The Australian Health Practitioner Regulation Agency (AHPRA) has *Procedures for the development of registration standards* which are available at www.ahpra.gov.au.

These procedures have been developed by the Australian Health Practitioner Regulation Agency (AHPRA) in accordance with section 25 of the Health Practitioner Regulation National Law, as in force in each state and territory (the National Law), which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice.

Below is the National Board's assessment of its proposed guidelines against the three elements outlined in the AHPRA procedures.

1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law.

Board assessment

The Board considers that the draft guidelines meet the objectives and guiding principles of the National Law.

The approved *Supervised practice registration standard* makes provision for the Board to use an examination. The draft guidelines provide that the Board will use an examination where a person is not qualified for general registration or there are concerns about a practitioner's practice, or where an examination is a requirement of an approved registration standard. The use of an examination ensures that practitioners have the opportunity to demonstrate that they meet the minimum capabilities to practise safely and ethically in the profession.

The draft guidelines will provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

The draft guidelines also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way.

2. The consultation requirements of the National Law are met

Board assessment

The National Law requires wide-ranging consultation on proposed registration standards, codes and guidelines. The National Law also requires the Board to consult other Boards on matters of shared interest.

The Board will ensure that there is public exposure of its proposal and there is the opportunity for public comment by undertaking an eight week public consultation process. This process includes the publication of the consultation paper (and attachments) on its website.

The Board has drawn this paper to the attention of key stakeholders.

The Board will take into account the feedback it receives when finalising guidance for the medical radiation profession.

3. The proposal takes into account the COAG Principles for best practice regulation

Board assessment

In developing these draft guidelines for consultation, the Board has taken into account the Council of Australian Governments (COAG) *Principles for best practice regulation*.

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures.

COAG principles

A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

Board assessment

The approved *Supervised practice registration standard* requires a practitioner to undertake an examination where it is required by the Board. The Board considers that draft *National examination guidelines* provide necessary information and guidance to practitioners on the conduct, preparation for, and outcomes of the examination.

B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

Board assessment

The Board considered whether its proposal could result in an unnecessary restriction of competition among health practitioners. The Board considers that this proposal is not expected to impact on the current levels of competition among health practitioners.

C. Whether the proposal results in an unnecessary restriction of consumer choice

Board assessment

The Board considered whether its proposal could result in an unnecessary restriction of choice for health consumers. The Board does not expect that the draft guidelines will significantly impact on the current levels of choice among health consumers.

D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

Board assessment

The Board considered the overall costs of the draft guidelines to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits for ensuring that only qualified and competent practitioners are registered.

The Board considers the requirements will have a low to moderate impact on costs to practitioners. These costs relate to the cost of the exam infrastructure and will be partly subsidised by the Board.

E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

Board assessment

The Board considers the draft guidelines have been written in plain English that will help practitioners to understand the guidelines. The Board has modified the structure of the guidelines and reviewed the wording to make the guidelines easier to understand.

F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time

Board assessment

The Board proposes to review the guidelines after three years of operation which will include an assessment against the objectives and guiding principles in the National Law and the COAG principles for best practice regulation.

However, the Board may choose to review the standard earlier, if it is necessary to ensure the guidelines continued relevance and workability.