



The peak body and leading voice for sonographers

Thursday, 14 April 2011

Senate Finance and Public Administration Committees
PO Box 6100
Parliament House
Canberra ACT 2600

Via email – fpa.sen@aph.gov.au

Dear Senators

Inquiry into the administration of health practitioners registration by the Australian Health Practitioner Regulation Agency

It is with pleasure we provide this submission to the Senate Finance and Public Administration Committees regarding the administration of health practitioners by the Australian Health Practitioner Regulation Agency (**AHPRA**).

The Australian Sonographers Association (**ASA**) was formed in 1992 and represents Australia's diagnostic medical sonographers. With a membership of over 3,000, or around 66% of the profession, the ASA is broadly acknowledged as the peak body. Our objectives are to:

- provide continuing education for sonographers
- promote best practice in sonography
- advocate members' interests and raise the profile of the profession
- provide a forum for communication
- provide member services and benefits.

Sonographers are not registered in Australia, however they are accredited through the Australasian Sonographers Accreditation Registry (**ASAR**). Following the release of the Productivity Commission's Report, *Australia's Health Workforce*, in 2002, the ASA has pursued the goal of registration for

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sonographers within the National Registration and Accreditation Scheme (**NRAS**).

The ASA has outlined our support of national registration in various submissions including a submission to the Productivity Commission's report, *Australia's Health Workforce* and submission to the Practitioner Regulation Sub-committee in October 2008. To support this work, the ASA Board ratified a Position Statement on Registration in March 2010 (**Appendix A**).

Further, we will be submitting our application to the Health Workforce Principals Committee for acceptance of sonographers into NRAS and the development of a Sonography Board of Australia in the 2014 tranche. In support of other unregistered health professions, we have also provided a response to the AHMAC consultation paper, *Options for regulation of unregistered health practitioners*.

Further information about the ASA and our position on registration can be found at www.a-s-a.com.au.

The profession of sonography

Sonographers are post-graduate qualified medical imaging professionals within the allied health sector who operate an ultrasound machine to perform diagnostic medical sonographic examinations. There are currently 4,541 active sonographers in Australia, with an additional 595 students.¹ Around 76% of sonographers are female with around 47% of ASA members working on a part-time or casual basis.²

Sonography utilises high frequency soundwaves which do not have the ionising radiation risks of other diagnostic imaging modalities, such as X-Ray or MRI. Sonographic practice includes, but is not limited to, the specialities of musculoskeletal (**MSK**), paediatric, breast, abdominal, vascular, cardiac, superficial organs, obstetrics and gynaecology.

In most instances, sonographers practise as an integral part of a diagnostic imaging team working in either a public or private sector environment, providing a wide range of sonographic services. This workplace arrangement varies across metropolitan, regional, rural and remote areas, as well as the public and private sectors. In addition to technical skills, sonographers must have extensive medical knowledge and have a demonstrated ability to exercise decisional latitude during examinations to determine the breadth of the investigation each patient requires.

Further information about sonographers can be found at **Appendix B**.

¹ ASAR Statistics, as at 2 November 2010.

² Di Marzio Research, Member Employment and Salary Survey, ASA, Quantitative Research Report, December 2010

Working with AHPRA

In the context of the significant work we have undertaken towards our application for national registration, the ASA seeks to raise the following concerns about the registration of health practitioners and AHPRA:

- **Access to information** regarding how the ASA, or any other interested party, can progress towards an application for registration has been difficult to obtain. Although the ASA has devoted significant resources to this project, we have found sourcing information on timelines and processes almost impossible to locate. Communication with AHPRA representatives has been difficult and, whilst we acknowledge that our application may not be their most pressing issue, the ASA believe it is an important issue for our profession and, indeed, a matter of public safety.
- **Information on transition** for health practitioners has been ambiguous, at best, and has caused significant confusion within the sector. Specifically, the long lead time between the announcement of the entry of Medical Radiation Practitioners, which is due to occur in mid-2012, and the pending appointment of a Board to direct and oversee this process has enabled other organisations within the sector to lobby for the inclusion of sonographers. The ASA has not been able to gain either written or verbal assurance that sonographers will not be part of this cohort, via AHPRA, which has necessitated pursuit along other avenues.
- The ASA notes that there are **no clear timelines** available with respect to entrance of further professions into the NRAS. This has enabled mis-information to circulate regarding whether future applications will be accepted and what other possible options may be.
- The ASA notes, with disappointment, that a project to determine the **governance framework** for the accreditation function, which has significant impact on the quality of the health workforce, is incomplete. We suggest that, given this is a core function of the NRAS, priority should have been given to having this in place prior to the 2010 commencement.

The ASA have strong relationships with stakeholders, including Commonwealth and State/Territory bureaucrats and are committed to continued positive collaboration with regard to registration. We note that AHPRA have been expected to undertake major national change in limited timelines. This has caused further ramifications in the health sector as practitioners remain confused about registration and, in the case of sonographers, the impact this may have on existing accreditation. We would welcome the opportunity to work more closely with AHPRA and hope that this inquiry will provide the Government and AHPRA with a clearer way forward towards the management of the registration of sections of Australia's health workforce.

Yours sincerely

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Chief Executive Officer