Dear COAG Health Council,

Independent Review of Accreditation Systems within the National Registration and Accreditation Scheme for health professionals

Thank you for the opportunity to attend the recent Sydney forum and to comment on the current discussion paper of the independent review of Accreditation System within the National Registration and Accreditation Scheme for health professionals.

The Australasian Society for Ultrasound in Medicine (ASUM) is a multidisciplinary society whose mission is to advance the clinical practice of diagnostic medical ultrasound for the highest standards of patient care. Its primary role includes providing education and setting standards of practice in this continually developing specialty.

ASUM represents all users of medical ultrasound, providing qualifications for both clinicians and sonographers across various specialties, as well as credentialing education for clinicians. ASUM also plays a large role in professional development to ensure all those performing these important examinations do so in a competent and safe manner.

Summary

Improving Existing framework:

Ultrasound is a constantly changing imaging modality. The traditional use in areas such as radiology, obstetrics, gynaecology, critical care, vascular and cardiology practice is being challenged by an emerging market of practitioners using ultrasound as an extension of health care services. The use of ultrasound, along with training requirements for all physicians, is largely unregulated and should be a cause for concern for patient care.

Performing medical ultrasound examinations is a highly operator dependent skill involving not only the correct use of the equipment, but having the skill and knowledge to obtain and interpret the images, as well as the clinical judgement required to ensure the patient management is optimised¹.

Ultrasound is considered a ‘safer’ option to other imaging modalities using radiation, however, in the hands of an untrained operator this tool can pose significant risk to the patient. The World Health Organisation studied the need for minimal standards in the training of diagnostic ultrasound².

Currently there is no regulation around physicians using ultrasound and the criteria to ensure they are doing so safely. There is also no requirement for any form of training to perform an ultrasound examination. Training is available for many areas now utilising ultrasound as a diagnostic tool, however recognition and regulation is still lacking in this area and therefore patient safety is at risk.

Regulation is required for those performing an ultrasound examination to ensure they are suitably qualified to do so and competent to practice as the discussion paper suggests. ASUM would be in a position to regulate, or assist with regulation in the field of ultrasound to ensure the profession meets the expectation of the patient.

Sonographers who pass an accredited training course will gain registration in Australia via the Australian Sonographers Accreditation Registry (ASAR). The ASAR accredits courses and sonographers, ensuring professional development is maintained. However, this is not a regulation body and the need for this remains to ensure patient safety. ASUM, along with other imaging stakeholders, will shortly submit a paper to review the need for registration under the APHRA umbrella with other imaging providers.

Relevance to health providers:
High quality education is paramount in the delivery of any health care examination and discussion, and every patient should be confident that this is the case for every examination performed. As mentioned, ultrasound education continues to develop and innovate to ensure relevance to the requirements in the marketplace.

Education, training, and accreditation:
ASUM believes a framework for accreditation is required to ensure standards are met across the board. Whether the government or another body is authorized to provide this framework, it is important that they acknowledge and recognise those given the authority to drive the accreditation and standards for the profession. It would be difficult, if not impossible, for government organisations to stay informed and audit every profession within healthcare adequately to ensure patient safety. ASUM, as the peak body of ultrasound in medicine, is in the perfect position to regulate standards and training requirements for those performing ultrasound examinations, but would need to be acknowledged by government in this role to ensure there is ownership by ASUM, but more importantly that all those utilizing ultrasound conform with the standards set by ASUM. Accreditation is important to set minimal standards and allow the general public to be confident in the care they are receiving particularly as patients when they are at their most vulnerable.

Consolidated Issues response:
Health program development and timeliness of assessment
- There should be a common approach to the development of professional competency frameworks. This is both transparent for the provider as well as the practitioner in ensuring they all understand what is required for someone to perform their role with competence, ensuring they understand their own limitations.
- Consumers would play a valuable role in the framework development to ensure expectations are understood and met.

Clinical experience and student placement
Student placement remains one of the most difficult aspects of training within the health profession, particularly for sonographers. Sonographers have remained on the skills shortage list for immigration for well over 10 years. However there are hundreds of students across Australia who have enrolled and successfully completed the initial didactic component for sonographer training, yet cannot find trainee positions. Both public and private imaging practices have greatly reduced the number of students they will assist in training due to the cost constraints employing a trainee, as well as having a senior sonographer and other members of the team taking time to train a sonographers. Training a sonographer typically takes a minimum of two years to gain a good understanding of clinical skills to perform this role competently.

Simulation practice may be helpful to gain basic skills for a sonologist or sonographer to perform an ultrasound examination. However this does not replace the training required to interpret and exam complex cases presented in clinical practice.

National Exam

ASUM believes a national exam would be a benefit for ensuring consistency of the sonographer profession across the various educational offerings now available for sonographers.

As sonographers are also tested on clinical skills in the workplace, a national training program for all examiners in the field of sonography would also benefit both the profession and the student, again for consistency and a minimal standard for the profession.

A national exam would create a more streamlined accreditation process, while also providing the education industry some flexibility in how their students reach a level of clinical competence. Sonographer training is offered in both the university system and VET sector, though still remains a skill that is greatly developed in the clinical realm. Students are able to choose the best learning opportunity to meet their own needs, while still meeting a professional standard as set by a national exam.

Currently there is no regulation for physicians performing ultrasound. While many realise the importance of training and education in this field, a national exam and standard would benefit the patient outcome by ensuring a minimum standard had been met.

Producing the future health workforce

Independence of accreditation and registration

Currently there is no regulation of physicians performing ultrasound

ASAR have the appropriate knowledge and skills to offer accreditation of sonographer training courses. They include consultation with stakeholders and sonographers alike. I am unaware of any incentives offered outside of membership for accreditation purposes, and much of the professional roles is performed by those passionate about the profession and patient care.

ASAR manage a registry of qualified sonographers, however this is not a regulatory body for sonographers and lacks any jurisdiction for control over those who perform an ultrasound examination in an unethical or illegal manner.

Setting health workforce reforms

Ministerial Council must acknowledge and support agreed accreditation standards, whether directly responsible or whether a professional body takes this role.