



a healthier world through  
sonographer expertise

Monday, 13 February 2023

Australian Health Practitioner Regulation Agency  
Level 7, 111 Bourke Street  
Melbourne VIC 3000

Submitted via email [accreditationreview@ahpra.gov.au](mailto:accreditationreview@ahpra.gov.au)

Dear Sir/Madam,

**Ahpra Review of Accreditation Arrangements to prepare for 2024-2029 cycle**

Thank you for the opportunity to provide feedback to the consultation on the Ahpra Review of Accreditation Arrangements.

The Australasian Sonographers Association (ASA) is the professional organisation for Australasian sonographers, who are the experts in ultrasound. With over 7,000 members, and representing more than 70% of Australasia's sonographers, the ASA's purpose is to foster a sonography profession that delivers high quality ultrasound with a vision to create a healthier world through sonographer expertise.

Sonographers are highly skilled health professionals who are strategically involved at the initial diagnostic stages of patient care and perform the majority of comprehensive medical diagnostic ultrasound examinations, which is the most utilised diagnostic imaging modality in Australia.

Unlike other diagnostic imaging divisions of practice, sonography is not currently regulated, meaning there are no nationally enforceable standards of practice that set the minimum expectations of ultrasound examinations performed by sonographers in Australia, or recency of practice requirements protecting the public and preventing harm. The ASA is advocating the inclusion of all sonographers as an added title under Ahpra's Medical Radiation Practice Board – a move that would make the accreditation arrangements significantly more relevant for all sonographers, as the recipients of what would become Ahpra-accredited programs of study.

Thank you for the opportunity to provide input into this Consultation. The ASA has responded with general comments, and a response to question 6. The ASA would be pleased to be involved in further discussions about accreditation arrangements.

If you have any questions or require additional information, please contact Slade Carter, General Manager, Policy and Advocacy, at [policy@sonographers.org](mailto:policy@sonographers.org) or (03) 9552 0000.

Yours sincerely,

**Ian Schroen**

**President**

Australasian Sonographers Association



## **Ahpra Review of Accreditation Arrangements to prepare for 2024-2029 Australasian Sonographers Association Feedback**

### **General comments on the consultation**

The ASA commends the findings of the recent internal audit of Ahpra's monitoring of accreditation agreements, which recommended that Ahpra "should consider greater specificity in the KPIs in future agreements and terms of reference to provide greater clarity about expected performance for accreditation authorities" (p. 33). This recommendation is helpful to defining and refining accreditation requirements.

The ASA supports Ahpra's proposed new priorities/areas of focus:

- Eliminating racism in healthcare
- Responding to challenges and downstream impacts of the COVID-19 pandemic on the health system and education sector
- Ensuring education providers have systems in place to enhance learning outcomes by supporting student wellbeing.

The ASA believes that these areas of focus have the potential to make inroads to addressing discrimination based on ethnicity, supporting student wellbeing, and tackling systemic issues related to the strain that COVID-19 has placed on the health and education sectors.

### **Question 6: Do you have any other comments about the future accreditation arrangements?**

The ASA considers that the current and future accreditation arrangements are lacking in their scope, as they exclude sonography courses, as sonographers are not regulated as a protected title under Ahpra. This is leaving a void in the future development of a critical component of the medical imaging workforce because sonographers are not currently the recipients of Ahpra-accredited programs of study.

The Medical Radiation Practice Accreditation Committee oversees the Ahpra accreditation function as it applies to medical radiation practitioners' programs of study. Unfortunately, this group only includes the 25% of sonographers who are also dual-trained and accredited as radiographers. 75% of Australia's sonographers remain unregulated, meaning that the current and proposed future accreditation standards do not apply to this significant group of medical professionals.

The Consultation notes that: "Program accreditation is the process of assessing whether a health practitioner education program and the education provider that provides the program produce graduates who have the knowledge, skills and professional attributes to safely and competently practise the profession in Australia" (p. 5).

Ahpra's program accreditation – and the skills being sought from education providers - does not apply to the majority of sonographers. This, in turn, impacts on the vast number of patients who have an ultrasound every day: ultrasound is the most utilised diagnostic imaging modality, and in the financial year 2021-2022, there were 11.67 million Medicare-funded diagnostic ultrasound examinations undertaken in Australia; most performed by sonographers.<sup>1</sup>

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<sup>1</sup> Medicare Statistics: [http://medicarestatistics.humanservices.gov.au/statistics/mbs\\_group.jsp](http://medicarestatistics.humanservices.gov.au/statistics/mbs_group.jsp) (Accessed January 2023).



The impact of the clinical work of sonographers on the health and wellbeing of such large numbers of patients should not be underestimated. To ensure high quality standards of practice through the accreditation program, it is paramount that all sonographers come under Ahpra's umbrella of regulation. The ASA continues to advocate the inclusion of all sonographers under Ahpra's Medical Radiation Practice Board by adding Sonography to the divisions of practice the Board regulates – a move that would make the accreditation arrangements being proposed significantly more relevant for sonographers.