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Thursday, 16 June 2022

Diagnostic Imaging and Pathology Branch  
Medical Benefits Division | Health Resourcing Group  
Australian Government Department of Health

Via email: [radiology@health.gov.au](mailto:radiology@health.gov.au), cc: [michael.ryan@health.gov.au](mailto:michael.ryan@health.gov.au)

To Michael Ryan

Thank you for your invitation seeking our views on the rules applying to the **supervision of Medicare funded musculoskeletal (MSK) ultrasound services** and the requirement that “the medical practitioner responsible for the conduct and report of the examination personally attends during the performance of the scan and personally examines the patient.”

The Australasian Sonographers Association (ASA), through its Sonographer Policy and Advisory Committee, supports amending the personal attendance requirements for MSK ultrasound to align with other ultrasound items. The clinical skills and complexity of MSK ultrasound is no higher than any other ultrasound services funded under Medicare and therefore there is no clinical justification for requiring a higher level of supervision for MSK ultrasound compared to other ultrasound services.

The Biosecurity Emergency Determination (the Determination) relating to COVID-19 revised the protocols to only provide the personal attendance service where it was deemed medically necessary. Since the removal of the requirement, there has not been a reduction in the quality of MSK ultrasounds performed by sonographers. In addition, waiting for the medical practitioner to personally attend every MSK ultrasound slows down the throughput of all patients, limiting the number of patients able to be scanned in a day, and consequently extending the waiting time for other patients needing diagnostic ultrasounds.

In summary, the ASA believes there is a strong need to review the requirements and supports a permanent change to the supervision requirements for MSK ultrasound aligned with what has been in place while the Determination has been in force, with the medical practitioner to provide the personal attendance service only where it is deemed medically necessary.

We look forward to hearing the outcome of this feedback. If you have any questions or require additional information, please contact the ASA Policy Officer, Jodie Coulter at [policy@sonographers.org](mailto:policy@sonographers.org) or (03) 9552 0000.

Yours sincerely

A handwritten signature in black ink that reads 'Jodie Long'. The signature is written in a cursive, flowing style.

**Jodie Long**  
Chief Executive Officer  
The Australasian Sonographers Association