

Monday, 7 March 2022

Adjunct Professor Debora Picone AO Chief Executive Officer Australian Commission on Safety and Quality in Health Care

Provided by email only to CCS@health.gov.au

RE: draft Stillbirth Clinical Care Standard consultation and request for preliminary endorsement

Dear Adjunct Professor Picone,

Thank you for inviting the Australasian Sonographer Association's (ASA) feedback on the draft Stillbirth Clinical Care Standard developed by the Australian Commission on Safety and Quality in Health Care (the Commission) and requestions the ASA's preliminary endorsement of the draft standard.

This draft standard has been considered by the ASA Sonographer Policy & Advisory Committee and the Women's Health Special Interest Group technical committees, composed of highly experienced sonographers who provide obstetric and women's health diagnostic services.

The ASA congratulates the Commission for taking the lead in developing such vital resources that achieves the stated aims. The documents are extensive and informative, with the expectations for patients, clinicians and services stated clearly.

I have included the ASA's feedback with this letter against the consultation questions, including small numbers of recommended changes across the documents. With these changes, the ASA confirms its preliminary endorsement of the standards and association information resources.

If you have any questions or require additional information supporting this feedback, do not hesitate to contact me by phone at +61 3 9552 0000 or email to Jodie.Long@sonographers.org.

We look forward to receiving the final Stillbirth Clinical Care Standard to consider for endorsement.

Yours sincerely,

Jodie Long

Chief Executive Officer

The Australasian Sonographers Association



Feedback from the Australasian Sonographers Association on the draft Stillbirth Clinical Care Standard

About the Australasian Sonographers Association

The Australasian Sonographers Association (ASA) is the professional organisation for Australasian sonographers. Sonographers provide the majority of medical diagnostic ultrasound examinations.

With over 7,000 members and a membership of more than 75% of Australasia's sonographers, the ASA has a significant role in supporting and advising the profession on the highest standards to provide the best possible outcomes in ultrasound for patients.

This feedback

This feedback is from the ASA Sonographer Policy & Advisory Committee and the Women's Health Special Interest Group technical committees, composed of highly experienced sonographers who provide obstetric and women's health diagnostic services.

ASA response to Questions about each quality statement (questions 1 & 2)

Quality statement 4 Obstetric ultrasound		
Page 30	The ASA requests that the Commission considers including reference to ASA resources of relevance, such as the ASA Early Pregnancy Loss clinical statement. ASA Clinical guidance resources are available from www.sonographers.org/resources-tools/clinical-guidance .	
Page 31 Line 21	Antenatal Ultrasound is poorly resourced in the public hospital system. First and second-trimester ultrasound is unable to be provided routinely. Low-cost alternatives can be challenging to find in the private system due to the level of MBS reimbursement for these examinations. The ASA recommends that these factors be considered before including a requirement for these services in the standards.	

Quality statement 5 Change in fetal movements		
Page 34 Line 25	The ASA recommends that the standard requires that discussion about fetal movements should also occur at all third trimester ultrasound examinations.	



Quality statement 9 Bereavement care and support after perinatal loss	
Page 48	Ultrasound is often the front line in detecting stillbirth and the modality used to confirm fetal death. The ASA recommends that the following is added to the expectations of clinicians and workplaces for women receiving bad news as these elements are also important when for women and their families receiving the news.
	It is also important that the practices that these women are sent to for ultrasound have a separate room for grieving women to use after receiving the news and (if possible) an exit from the practice that does not involve them walking through the waiting room of pregnant people.

ASA response to Questions about the clinical care standard (question 3)

Page 11 Line 21 to 29	The ASA requests that sonographers be explicitly stated in the list of clinicians. Sonographers have a fundamental role throughout the pregnancy journey. They have a salient role when diagnosing stillbirth and are intrinsic in the patient care experience across this time.
General comment	The ASA notes that there are a lot of trigger concepts while going through the content. The standard could benefit from a disclaimer that the content can trigger emotions, followed by helpline numbers or support resources for the reader.

ASA response to the Questions about the supporting resources (questions 5 to 7)

General comment	Similarly to the response to question 3, the ASA notes that there are a lot of trigger concepts while going through the content.
	These reference information and guides could benefit from a disclaimer that the content can trigger emotions, followed by helpline numbers or support resources for the reader. Particularly in the consumer-targeted information.