



the peak body and leading voice  
for sonographers

Friday, 6 November 2020

Beryl Kelly  
Chairperson  
Medical Radiation Technologists Board  
PO Box 11-905  
Wellington New Zealand 6142

Via email: [mrt@medsci.co.nz](mailto:mrt@medsci.co.nz)  
Cc: [miriam.brown@medsci.co.nz](mailto:miriam.brown@medsci.co.nz)

Dear Chairperson,

Thank you for inviting feedback on the proposed changes to the prescribed qualifications that the Medical Radiation Technologists Board (the MRTB) uses to register medical imaging and radiation therapy professions.

The ASA commends the MRTB for taking steps to find solutions to the critical sonographer workforce shortage in New Zealand. However, unfortunately, the ASA cannot support or agree with the proposed changes as presented.

This is for several reasons centred around questions on if these changes will be able to be implemented in a way that continues to assure the safety of New Zealanders accessing ultrasound examination, and if these changes will address the current barriers to bringing competent and appropriately trained overseas sonographers into the country to support the local workforce needs.

The MRTB must not proceed with the proposed changes for sonography. Instead, the ASA strongly requests that the MRTB call a sonography industry roundtable before the end of the year to urgently develop and agree alternative solutions that improve the assessment and intake of overseas trained sonographers.

For example, the MRTB could better recognise the training and practice equivalence of the Australia sonographers accredited via the Australia Sonographer Accreditation Registry (ASAR), to New Zealand sonographers. There are over 6,500 ASAR accredited sonographers in Australia. This simple administrative change would be a far more effective short-term measure than what is being proposed.

After this situation has been resolved, this work can be built upon through the MRTBs engagement of the industry in early 2021 to “future-proof the regulation of the profession to ensure better workforce flexibility and responsiveness to changing community health needs and demands.”

Please note that this response was developed following consultation with medical imaging employers and sonographers across New Zealand. We will provide this feedback via the online form as requested, and a copy will be provided to the Ministry of Health for information.

If you require any additional information from us on this matter, please contact the ASA Policy & Advocacy Advisor, James Brooks-Dowsett, by phone on +61 406 998 429 or email to [policy@sonographers.org](mailto:policy@sonographers.org).



Yours sincerely,

A handwritten signature in black ink, which appears to read "Ian Schroen". The signature is written in a cursive style with a long, sweeping tail.

**Ian Schroen**

President of the Board  
The Australasian Sonographers Association

## Attachment 1: The Australasian Sonographers Association response to the Medical Radiation Technologists Board proposed changes to the prescribed qualifications for registration.

### Medical Radiation Technologists Board consultation questions

Question 1. Do you agree or disagree with the proposed changes?

The sonographer workforce shortage New Zealand is a critical issue. Addressing this is a key priority<sup>1</sup> for the Australasian Sonographers Association (the ASA). For several years now, we have been engaging and supporting the industry in New Zealand to look at innovative solutions to sustain the workforce into the future, in both a public and private health setting.

**Unfortunately, at this time, the ASA cannot support or agree with the proposed changes as presented.**

The ASA provides further detail in support of this response below. Please note that our response has been informed by consultation with sonographers and their employers across the country.

Question 2. Please describe why you do or don't support the propose changes as outlined in the consultation document.

The ASA commends the Medical Radiation Technologists Board (MRTB) in pursuing change to find solutions to the critical sonographer workforce shortage in New Zealand. However, there are several reasons that the ASA cannot support the proposed changes as presented in the consultation document.

It doesn't address the current barriers for overseas trained sonographers

Feedback from the industry in New Zealand is that the most significant barriers in bringing more overseas-trained sonographers is inconsistency in how they are assessed, lack of transparency of the process and the variability of extended supervised practice and constrained practice, the burden of which is typically carried by employers.

This proposed change would not address any of these current barriers.

However, there is a real risk that proceeding with his change would create even more burden for sonographers and employers across the country, in both public and private settings. Particularly if the MRTB found it needed to apply increased extended supervised practice and constrained practice requirements overseas individuals who become registered as sonographers via this new pathway.

**Two solutions to this that do not require regulation change are for the MRTB to**

<sup>1</sup> The Australasian Sonographers Association. *Addressing the workforce shortage in New Zealand*.  
Webpage: [www.sonographers.org/advocacy/workforce-nz](http://www.sonographers.org/advocacy/workforce-nz)

- **make available a list of overseas qualifications broadly considered as equivalent for practice in New Zealand. For example, relevant qualifications from Australia, Canada and the UK; and**
- **establish a committee with transparent criteria and processes to assess and determine overseas trained sonographers for practice in New Zealand.**

#### Relying on the new electronic examination system

In September 2019, the MRTB launched the new online examination to replace the Registration Examination Assessments (REA) used for the registration of overseas trained Medical Imaging Technologists and Radiation Therapists.

A vital component of the REA is the reliance on the three month 'familiarisation period' that is required of overseas individuals that choose this pathway to become a registered sonographer in New Zealand. During this time, the sponsoring workplace undertakes a pre-assessment of the overseas individual, followed by the REA of the individual undertaken by the MRTB.<sup>2</sup>

At the end of 2019, the questions for this online assessment were still being developed with workshops on the exam content to be held from early 2020.<sup>3</sup> Using the online examination to replace the REA as a pathway to assess and register overseas individuals as sonographers is a very new approach. The success of this approach is yet to be evaluated. It is also unclear if there is any 'familiarisation period', an essential quality control in the REA process.

Comprehensive medical diagnostic ultrasound is 'operator-dependent', meaning it is the sonographer who is angling the ultrasound probe into the exact position to ensure the right image is seen for diagnosis, all the while interpreting data and operating complex equipment.

If the sonographer fails to view the entire structure or recognise that something is not normal, diagnostic information may be missed. The reporting medical practitioner relies on the sonographer to capture the still image in the area of concern. The outcome of an ultrasound examination is reliant on the competence and expertise of the sonographer, not the technology.

**The current format of the online assessment is a three-hour multiple-choice examination<sup>4</sup>. This approach doesn't contain a practical evaluation of the applicant's use of the technology to undertake the work – an essential component of the work of a sonographer.**

Furthermore, if the REA, and the now online examination, are applicable under the existing regulations, why is the proposed regulation change needed?

#### Different medical imaging professions have different training requirements

The ASA has some concern for how the parameters of the new qualification pathway for sonographers have been determined. E.g.:

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<sup>2</sup> MRTB Registration Examination Assessments information.

[https://www.mrtboard.org.nz/assets\\_mrtb/Uploads/REA-PDF-MD-3.pdf](https://www.mrtboard.org.nz/assets_mrtb/Uploads/REA-PDF-MD-3.pdf)

<sup>3</sup> Newsletter of the New Zealand Medical Radiation Technologists Board Issue 25: Nov 2019.

[https://www.mrtboard.org.nz/assets\\_mrtb/Uploads/November-2019-MRTB2.pdf](https://www.mrtboard.org.nz/assets_mrtb/Uploads/November-2019-MRTB2.pdf)

<sup>4</sup> MRTB. *Online examinations: Candidate Handbook*. Jun 2009

[https://www.mrtboard.org.nz/assets\\_mrtb/Uploads/2019-Jun-V1-MRT-Exam-Candidate-HBook2.pdf](https://www.mrtboard.org.nz/assets_mrtb/Uploads/2019-Jun-V1-MRT-Exam-Candidate-HBook2.pdf)

*“An undergraduate qualification in medical imaging or radiation therapy and a minimum of 2½ years equivalent fulltime appropriate ultrasound practice in the immediate preceding 5-year period and a pass in a Board examination.”*

The consultation document, and more recently, the MRTB's Oct news<sup>5</sup>, state that the MRTB relies on the findings of the *Simpson Report*<sup>6</sup> (Section 11 page 190-192) to support these proposed changes.

The relevant information here is highlighting the significantly higher qualification and registration requirements for Medical resonance imaging (MRI) practitioners in New Zealand versus Australia. And the wording of the new forth pathway proposed for all medical imaging professions suggests this was used as a template for the parameters of the proposed changes.

However, unlike MRI practitioners, the entry to profession qualification requirements in Australia<sup>7</sup> is equivalent to the current New Zealand requirements. Equivalency can also be found when looking at qualification and training requirements for sonographers in some other countries.

**It is dangerous to apply broad mirrored qualification parameters in this way, which creates a real risk of unintended negative consequences.**

#### Lack of industry consultation in developing this solution

The ASA is deeply disappointed about the lack of industry consultation the MRTB undertook in the development of this proposed change.

The national sonographer shortage is a critical issue, across all geographic locations and areas of practice. This has been further exacerbated in recent years with Auckland University now the only university providing a course to train new general sonographers. And there is no local educational pathway to become a cardiac sonographer.

The ASA recognises that until local training solutions are implemented – something that requires urgent attention – importing competent and appropriately trained sonographers from overseas remains an essential mechanism to address the local workforce needs.

However, as stated above, we have real and tangible concerns about what is being proposed. If the MRTB had undertaken some industry consultation before producing this perceived solution, many of the issues stated above could have been avoided or addressed.

Before proceeding with these proposed changes for sonography, it is critical that the MRTB holds an industry roundtable to develop alternative changes to the assessment of overseas trained sonographers that are appropriate and address the current barriers, and do not result in unintended consequence for the employer and the local workforce.

After this situation has been resolved, the MRTBs plan to engage the industry from early 2021 to “future-proof the regulation of the profession to ensure better workforce flexibility and responsiveness to changing community health needs and demands” must still occur.

<sup>5</sup> Newsletter of the New Zealand Medical Radiation Technologists Board Issue 27: Oct 2020

[https://www.mrtboard.org.nz/assets\\_mrtb/Uploads/October-2020-MRTB.pdf](https://www.mrtboard.org.nz/assets_mrtb/Uploads/October-2020-MRTB.pdf)

<sup>6</sup> Health and Disability System Review. 2020. *Health and Disability System Review – Final Report – Pūrongo Whakamutunga*. Wellington, NZ. Mar 2020

<https://systemreview.health.govt.nz/assets/Uploads/hdsr/health-disability-system-review-final-report.pdf>

<sup>7</sup> ASAR Accredited Courses. <https://www.asar.com.au/course-accreditation/asar-accredited-courses/>

**The ASA strongly requests that the MRTB urgently call a sonography industry roundtable to develop and agree alternative solutions to improve the assessment and intake of overseas trained sonographers.**

Questions 3. Is there anything stated in the consultation document that requires further clarification?

Please find following a list of questions which the MRTB is asked to provide further information on before any further consideration of these proposed changes for sonographers:

- How will the MRTB assess the practical competence of overseas applicant that pass the online examination?
- How were the parameters for the fourth proposed pathway for qualification determined appropriate for sonography?
- Depending on their field, individuals can become sonographers from a range of undergraduates. For example, many cardiac sonographers progress into the profession with medical science undergraduate qualifications. Has this been considered?
- Currently, the online examination is only offered in English and only available in Australia, Canada, New Zealand, South Africa, United Kingdom, United States of America. However, it is not clear if eligibility is restricted to citizens of these countries. What are the specific eligibility criteria to sit the online examination?
- If the online examination is permissible under the current “Prescribed Qualifications for Registration as a Medical Imaging or Radiation Therapy Practitioner”, why is this change needed?
- What consultation has occurred with the sonography industry in developing these proposed changes?

Question 4. Any further comments?

The MRTB must not proceed with the proposed changes for sonography. Instead of the ASA strongly requests that the MRTB call a sonography industry roundtable before the end of the year to urgently develop and agree alternative solutions that improve the assessment and intake of overseas trained sonographers.

For example, the MRTB could better recognise the training and practice equivalence of the Australia sonographers accredited via the Australia Sonographer Accreditation Registry (ASAR), to New Zealand sonographers. There are over 6,500 ASAR accredited sonographers in Australia. This simple administrative change would be a far more effective short-term measure than what is being proposed by the MRTB.

Consultation with sonographers and employers across New Zealand has identified that there is a great and shared concern that the changes proposed by the MRTB will have a significant impact on the industry and the quality of ultrasound examinations provided to New Zealand patients.

New Zealanders deserve reliable access to high-quality ultrasound examinations. Such a roundtable is a real opportunity to develop and agree on practical solutions to bring overseas trained sonographers into the country to support the local workforce needs.

After this situation has been resolved, this work can be built upon through the MRTBs engagement of the industry in early 2021 to “future-proof the regulation of the profession to ensure better workforce flexibility and responsiveness to changing community health needs and demands.”