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for sonographers

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Dr Lance Lawler  
President  
The Royal Australian and New Zealand College of Radiologists  
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Dear Dr Lawler,

Thank you for the opportunity to consider the Royal Australian and New Zealand College of Radiologists draft *Standards of Practice for Artificial Intelligence in Medicine*.

I am pleased to congratulate the College on the quality of these standards. They provide a good statement of the expectation that patient safety is placed first. Recognises that artificial intelligence (AI) can have a valuable role in medicine. Balanced against ensuring interoperability with existing systems and recognising the leading role that health professionals must have in the development and implementation of such new systems.

In considering the draft, the ASA requests the following changes to enhance these standards.

1. The standards would benefit from increased recognition that all clinical staff, including sonographers, should be directly involved in advising the development and implementation of new technology.

Sonographers and other non-radiologist clinical staff will be directly impacted by many of the new technologies developed with, and that utilise AI. We request the standards recognise that sonographers and other non-radiologist clinical staff should have roles as key users, opinion leaders and experts in development and implementation of new tools where they will be the users of the tools in the radiology workflow.

This could be done with changes such as Line 218 could be expanded to "... .This may require generalist and/or sub-specialist expertise and involvement of other members of the clinical team where relevant." With 'Clinical team' clarified in the definitions of the standards

2. The standards should also include a statement about the evidence or process required to be completed before an AI tool is validated. This is addressed in the Audit Standard, where a tool is already in place. However, what is required before deployment (e.g. TGA approval) also needs to be described.

If you have any questions or require additional information in support of this feedback, please contact the ASA Policy Advisor, James Brooks-Dowsett, by phone on (03) 9552 0008 or email to [policy@sonographers.org](mailto:policy@sonographers.org).

Thank you again for the opportunity to review these standards and for your leadership in this important area. Please let me know if we can be of any further assistance in this work.

Yours sincerely,

A handwritten signature in black ink, reading 'Jennifer Alphonse'. The signature is written in a cursive, flowing style.

**Dr Jennifer Alphonse**  
President  
The Australasian Sonographers Association