



the peak body and leading voice
for sonographers

Friday, 30 November 2018

Professor Bruce Robinson
Chair
MBS Review Taskforce
Australian Government Department of Health

Email: MBSTaskforceCommittees@health.gov.au

Dear Prof. Robinson,

Re: Medicare Benefits Schedule (MBS) Review Taskforce - MBS Schedule Review Taskforce - Report from the Diagnostic Medicine Clinical Committee.

Thank you for providing the Australasian Sonographers Association (ASA) the opportunity to provide feedback to the considerations and recommendations of the *Report from the Diagnostic Medicine Clinical Committee*.

The ASA also thanks the Diagnostic Medicine Clinical Committee for their significant effort reviewing the many MBS items within their remit. This work is of significant importance to Australian's access to quality and appropriate diagnostic imaging and health services.

The ASA is broadly supportive of initiatives that improve consumer health literacy, particularly around diagnostic imaging options and application; as well as measures such as clinical decision support systems that assists referring clinicians in their roles.

However, we have concerns regarding recommended restrictions to items for ultrasound of the ankle/hind foot; that they will result in unintended exclusion of appropriate use of ultrasound for services not associated with ankle injury. Please find additional detail included as an appendix to this letter.

Responding to the consultation questions:

1. The ASA supports the ultrasound specific recommendations '1.2.8 Shoulder ultrasound' and '1.4 Non-item recommendations' of the recent *Report from the Diagnostic Medicine Clinical Committee*;
2. The ASA does not support recommendation '1.2.7 Ankle/hind foot ultrasound' and encourages the committee to reconsider and revise their recommendations for these items.

If you require further information in support of this feedback please contact James Brooks-Dowsett, ASA Policy & Advocacy Advisor, by phone on (03) 9552 0008 or email to policy@sonographers.org.

I look forward to continuing to support the Governments work aligning the MBS with contemporary clinical evidence and practice for improved health outcomes for patients.

Your sincerely,

Dr Jennifer Alphonse PhD

President – Australasian Sonographers Association

APPENDIX: the Australasian Sonographers Association response to the MBS Schedule Review Taskforce - Report from the Diagnostic Medicine Clinical Committee

1.2.7 Ankle/hind foot ultrasound – **NOT SUPPORTED**

The Committee recommendations are to:

1. *change the item descriptors to clarify that the only appropriate use of these items is for the investigation of (suspected or confirmed) tendon or tendon sheath injuries.*
2. *clinician and consumer education to support these changes.*
3. *if the combined requesting and education strategies prove insufficient to change behaviour, then it recommended consideration of mandatory Clinical Decision Support for the requesting of ankle ultrasounds.*

The ASA is supportive of any measures that assists referring clinicians in their roles (such as clinical decision support systems) and contribute to improving Australians' health literacy, as referred to in the second and third parts of this recommendation.

The ASA also acknowledges and supports the best practice recommendations regarding the use of diagnostic imaging for acute ankle trauma¹. However, the items being considered in the review apply for imaging of the ankle **AND/OR** the hind foot.

When considering the broader scope of these items, beyond just the ankle; applying these restrictions will have unacceptable consequences. For example, preventing the use of ultrasound in identification and retrieval of soft-tissue foreign bodies from the hind foot, for which there is good evidence to support this practice².

We encourage the committee reconsider and revise their recommendations for these items.

1.2.8 Shoulder ultrasound – **SUPPORTED**

The Committee recommendations are to:

1. *no longer list suspected occult fracture as a reason for requesting these items.*
2. *the claiming of these items in conjunction with shoulder X-ray items*
3. *creating a new item for requesting shoulder ultrasound and X-ray at the same time, which would require the requesting clinician to provide clinical notes on the reason for requesting both items on the request form*
4. *creating explanatory notes clarifying the appropriate pathways for shoulder imaging. These recommendations are to be supported by requester, provider and consumer education initiatives.*

¹ Choosing Wisely Australia. *Recommendation 1: Don't request imaging for acute ankle trauma unless indicated by the Ottawa Ankle Rules.* Royal Australian and New Zealand College of Radiologists. April 2015

² Rockett MS, Gentile SC, Gudas CJ, Brage ME, Zygmunt KH. *The use of ultrasonography for the detection of retained wooden foreign bodies in the foot.* The Journal of foot and ankle surgery. 1995 Sep 1;34(5):478-84.

1.4 Non-item recommendations – SUPPORTED

The ASA supports the recommendation that the Government review consumer health literacy with a view to implement education that supports improved consumer health literacy, particularly around diagnostic imaging options and application; as well as measures such as clinical decision support systems that assists referring clinicians in their roles.