



JANUARY 2023



**The Australasian Sonographers Association
2023–24 Pre-Budget Submission To
The Australian Government**



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EXECUTIVE SUMMARY



As President of the Australasian Sonographers Association (ASA), I am delighted to provide our organisational Pre-Budget Submission for the 2023–2024 Australian Government Budget.

Sonographers are highly skilled health professionals who are strategically involved at the initial diagnostic stages of patient care and perform the majority of comprehensive medical diagnostic ultrasound examinations.

Ultrasound is the most frequently utilised modality from the suite of diagnostic imaging services. Patients across Australia need timely access to comprehensive medical diagnostic ultrasound for a range of health and wellbeing services, including pregnancy, diagnosing cancers, heart conditions, and other critical health issues.

The outcomes of an ultrasound examination are reliant on the competence and expertise of the sonographer, not the technology in use. Sonographers complete more than four years of tertiary education, including over 2,200 hours of ultrasound clinical training, to develop this expertise.

The reporting medical practitioner relies on the sonographer to capture the still image of the area of concern. If the sonographer does not provide a high quality medical examination, diagnostic information may be missed, affecting the patient's diagnosis and treatment.

Unfortunately, there are a number of pressures on sonographers that directly affect community access to quality and timely medical diagnostic ultrasound.

The two biggest issues:

- **Sonographers are not regulated**, which puts patient health and safety at risk.
- There is a **15-year critical shortage of sonographers in Australia**, caused largely by the poor availability of clinical training placements.

Our 2023–2024 Pre-Budget Submission provides proven and modestly costed solutions to these two issues.

With over 7,000 members, and financial membership of more than 70% of Australia's sonographers, the ASA is the peak body and leading voice for sonographers and leads the profession in delivering excellence in sonography to the community.

We have a significant role in supporting and advising the profession on the highest standards to provide the best possible diagnostic medical ultrasound for patients.



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However, we need the support of the Australian Government to safeguard patients receiving comprehensive medical diagnostic ultrasound services and to ensure they continue to have access to sonographers.

The ASA looks forward to continuing to work with the Australian Government and all our stakeholders in the interests of the sonography profession and patients.

Ian Schroen
President
Australasian Sonographers Association
January 2023



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RECOMMENDATIONS

The Australasian Sonographers Association requests the Australian Government:

- 1. Regulate sonographers through the National Registration and Accreditation Scheme by adding the profession to the existing Medical Radiation Practice Board of Australia.**
- 2. Invest \$3.466m over three years in funding assistance for sonographer clinical supervisors, helping ensure workforce shortages are reduced, and enabling student sonographers to complete their training.**



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PROTECT AUSTRALIANS BY INCLUDING SONOGRAPHERS IN THE NATIONAL REGISTRATION & ACCREDITATION SCHEME

What is the problem?

The health and safety of Australians is at risk because sonographers are not regulated under the National Registration and Accreditation Scheme.

Why is this important?

Sonographers are highly skilled health professionals who perform the majority of diagnostic medical ultrasound services.

Ultrasound is the most commonly accessed diagnostic imaging service in Australia, representing 43% of all diagnostic imaging services in the 12 months to June 2022.¹ However, **75% of sonographers in Australia are not regulated.**

The outcome of an ultrasound examination relies on the expertise of the sonographer to operate the equipment while interpreting the images so that the correct image is captured for diagnosis. This is recognised by Medicare, with only diagnostic ultrasound services provided by doctors and accredited sonographers funded under the Medicare Benefits Scheme.

Yet sonographers are not regulated by the National Registration and Accreditation Scheme (NRAS), which regulates other health professions, such as doctors, nurses, and other medical imaging professions.

Why regulation?

Without regulation, there are no national standards of practice that set the minimum expectations of ultrasound examinations performed by Australian sonographers, putting patients' health and safety at risk.

Where a sonographer fails to produce quality images or identify pathologies, there is no enforceable measure of the quality of ultrasound examinations that sonographers provide.

¹ Australian Government: Services Australia, Medicare Group Reports, Diagnostic Imaging Services, for financial year to June 2022.

http://medicarestatistics.humanservices.gov.au/statistics/mbs_group.jsp (Accessed December 2022).



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Importantly, complaints handling for sonographers is currently inconsistent, fragmented and ineffectual. There is a growing list of situations where a complaint is raised against a sonographer, the complaint is insufficiently investigated, and the situation becomes a criminal prosecution to be resolved.

Without a national coordinated complaints process for patients, sonographer errors and malpractice are expected to be significantly underreported both in terms of the impact on patients and the frequency of occurrence.

Legal cases against sonographers have grown in recent years, particularly in severity, with four significant claims (each over \$650,000 and to a total value of ~\$4 million) in the space of 18 months in one state alone, demonstrating sonographers are a high risk profession with a high risk of potential adverse outcomes for patients.

Furthermore, without national regulation, other patient safety and quality controls such as recency of practice requirements and nationally enforceable standards of practice do not currently exist for sonographers.

Patients receiving ultrasound examinations performed by sonographers should reasonably expect that there are appropriate safeguards in place to protect them and ensure the provision of high quality services.

‘Without national regulation there is no enforceable measure of the quality of ultrasound examinations performed by Australian sonographers’

What is the solution?

Regulate sonographers through the NRAS by adding the profession to the existing Medical Radiation Practice Board of Australia (MRPBA).

Importantly, this regulation change would only apply for the medical sonographer profession; it is not the regulation of who can perform a medical ultrasound.

Regulating sonographers through the NRAS by adding them to the MRPBA is a cost-effective solution, particularly as **25% of sonographers are already registered with the Medical Radiation Practice Board of Australia as another profession** (e.g. radiographer). This is the best solution to ensure patient safety and efficient administration.

This is the same model used in New Zealand, where diagnostic imaging professions are regulated through a single regulation authority, the Medical Radiation Technologists Board.



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There is broad support to regulate sonographers through the NRAS by adding sonographers to the MRPBA. This includes the support of all diagnostic imaging profession peak bodies and employers, health profession unions and the medical fraternity, including the Australian Medical Association and the Royal Australian and New Zealand College of Radiologists.

The Australian Senate confirmed its support for this change. On 4 December 2019, all senators agreed to a motion that *'calls on the Federal Government to sponsor a submission from the Australian Sonographers Association to the COAG Health Council for consideration of the proposal for sonographers to be regulated by adding the profession to the list of imaging professions already regulated by the Medical Radiation Practice Board of Australia'*.

Unfortunately, the COVID-19 pandemic has delayed ministerial consideration of the proposal to regulate sonographers. In May 2022, a formal industry working group, known as the Working Group for Sonographer Regulation, and composed of the ASA, the Australasian Society for Ultrasound in Medicine (ASUM), the Australian Sonographer Accreditation Registry (ASAR) and a sonographer representative, finalised a submission requesting the inclusion of the sonography profession in the NRAS, under the existing MRPBA.²

The regulation submission comprehensively addresses each of the six criteria specified in the Australian Health Ministers' Advisory Council's *AHMAC information on regulatory assessment criteria and process for adding new professions to the NRAS for the health professions*.

'Regulation of sonographers is cost neutral and easy to implement: it will help ensure better service quality and safety for patients'

The ASA is now seeking the inclusion of the sonographer regulation submission for consideration at the Health Ministers' Meeting (HMM).

Since regulation requires the support of the HMM, we are asking the Australian Government to:

- recognise that national regulation of sonographers is essential to protect the health and safety of Australians
- sponsor a submission from the ASA to the HMM to discuss sonographer regulation
- support the case to regulate sonographers through the NRAS by committing through ministerial members of the HMM to request that the regulation submission be referred to the Health Chief Executives Forum (HCEF) for preliminary assessment, and subsequent formal regulatory assessment.

² See the full submission at: <https://www.sonographers.org/advocacy/sonographer-regulation-in-australia/>.



What is the budget impact of the solution?

This is a budget neutral initiative that improves protection, safety and quality assurance for the public.

Any cost to the Federal Government will be borne by the ordinary operation of the Office of Best Practice Regulation.³ It is expected that there would also be some cost to state and territory governments to make the necessary legislation adjustments. However, this will be offset by a reduction in state and territory costs to investigate unregistered practitioners.

Budget impact

The ASA estimates a cost of \$30,000 to \$55,000 per jurisdiction to implement the legislative changes. However, this cost will be recouped through states and territories no longer having the same burden of investigating complaints, which will instead be managed by the Australian Health Practitioner Regulation Agency (AHPRA), the agency responsible for implementing NRAS. The cost of investigating a complaint against an unregistered practitioner is approximately \$18,850 per complaint investigated.⁴

Furthermore, establishing sonographer regulation through an existing board will avoid the significant startup cost of an estimated \$1.62 million, the amount needed to establish the Paramedicine Board of Australia.⁵

Budget impact is thus cost neutral.

2023–24 (\$m)	2024–25 (\$m)	2025–26 (\$m)	Total (\$m)
–	–	–	–

³ AHMAC information on regulatory assessment criteria and process for adding new professions to the National Registration and Accreditation Scheme for the health professions. Australian Health Ministers' Advisory Council. Sept 2018.

⁴ The Victorian Department of Health (2013) final report – Options for regulation of unregistered health practitioners. Australia: Australian Health Ministers' Advisory Council. Available at: <https://obpr.pmc.gov.au/sites/default/files/posts/2013/08/unregistered-health-practitioners-final-report-decision-RIS.pdf/>.

⁵ Australian Health Practitioner Regulation Agency (2018) The Australian Health Practitioner Regulation Agency and the National Boards, reporting on the National Registration and Accreditation Scheme. 2017/18 Annual Report. Available at: www.ahpra.gov.au/annualreport/2018/downloads.html/.



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Address the critical sonographer workforce shortage to ensure Australians continue to have access to medical diagnostic ultrasound services

What is the problem?

Australia's critical sonographer workforce shortage threatens the ongoing access of all Australians to quality diagnostic medical ultrasound examinations.

Sonographers provide the majority of comprehensive diagnostic ultrasound services across Australia. However, the profession has been an occupation of shortage since at least 2007.⁶

Rather than improving over time, this situation is now in crisis, with a large cohort of sonographers approaching retirement age and more than half of sonographers are working part time.

'The singular barrier to addressing this workforce shortage is the poor availability of sonographer clinical training placements'

Why is this important?

Ultrasound is often a patient's first diagnostic imaging exam, either eliminating the need for, or informing the use of, other more expensive diagnostic imaging. Patients need timely access to comprehensive medical diagnostic ultrasound for a range of health services, including pregnancy management and vital health diagnoses and disease progression.

A shortage of sonographers directly affects patient access to timely, quality and comprehensive medical diagnostic ultrasound services. Delays in accessing these services are associated with avoidable and poor (sometimes catastrophic) health outcomes for the patient, and can result in increased costs for the patient and the health system due to the need to treat worsened health conditions.

⁶ Department of Jobs & Small Business. Labour Market Research Health Professions, Australia, 2017–18. Australian Government.



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Service demand has outgrown the workforce

In the 10 years to June 2022, growth in services accessed by patients has increased 60%.⁷

However, the number of sonographers available to meet those demands is rapidly declining. Sonographers are currently listed on the Skills Priority List as being in shortage, nationally, at a moderate level.

In November–December 2022, the ASA undertook a survey of major employers as part of the organisation’s response to the Australian Government National Skills Commission Stakeholder Survey for the Commission’s 2023 Skills Priority List.

Key findings:

- 83% of respondents indicated the shortage is widespread, ongoing, and national. This is particularly the case for sonographers with experience, and in the public sector where salaries tend to be lower and are influenced by state awards.
- 88% of respondents noted there is an undersupply of sonographers.
- Anecdotal evidence indicates that employers are struggling to secure applicants for advertised positions, with some receiving no applications, or only one or two per advertised role. At the same time, some employers reported needing to close ultrasound rooms as there are not enough sonographers to conduct the ultrasounds.
- 81% of respondents indicated they expect demand for sonographers to increase.

‘83% of employers said the shortage of sonographers is widespread, ongoing and national’

The sonographer workforce shortage is compounded by the fact that **53% of sonographers work in part-time roles**⁸, and 25% of the current workforce will reach retirement age in the next decade, meaning that if changes are not enacted, the shortage of sonographers is expected to get worse.

In summary, there are not enough new sonographers joining the workforce to sustain the current demand for comprehensive diagnostic ultrasound, and even if there were, there are not enough clinical placements available for them to complete their training.

⁷ Medicare Australia Statistics. Available at: <http://medicarestatistics.humanservices.gov.au/>.

⁸ Australasian Sonographers Association (2022) Australasian Sonographer Employment and Salary Industry Report, May 2022.



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The cost to the Government

If patients are unable to access ultrasound services, they will likely be referred to other more costly diagnostic imaging, such as CT or MRI. This, in turn, significantly increases the likelihood of the patient not receiving the diagnostic exam quickly or at all due to prohibitive out-of-pocket costs and poor access to some services, including MRI. Despite the removal of MRI licences in MMM areas 2–7, there are many sites in metropolitan areas (MMM 1) without MRI licences, and yet they contain 70% of the Australian population.⁹

Where patients cannot access a sonographer for a medical ultrasound examination, the equivalent CT examination costs the Australian Government twice as much. For MRI, the cost is 3–4 times more expensive than ultrasound.

An over-reliance on more costly modalities would be fiscally challenging given the scale of ultrasound used by Australians: in the year ending June 2022, there were 11.67 million ultrasound services provided through Medicare.¹⁰

Demand for comprehensive medical diagnostic ultrasound is already significantly outstripping the availability and growth of the sonographer workforce. Without intervention, more expensive diagnostic imaging will be utilised at a growing rate with the Australian Government and taxpayers bearing these escalating costs.

*‘In 2021–22, 11.67 million ultrasound services were provided to
Australians through Medicare’*

The bottleneck

The pathway to becoming a sonographer is through the completion of an accredited postgraduate course¹¹, with an undergraduate qualification in health or science. The education is approximately 80% clinical training at a workplace and 20% academic coursework.

To ensure sonographer competency with the technology, as part of the postgraduate training, most sonographer students need to **complete over 2,200 hours of supervised ultrasound clinical training (equivalent to three days a week for two years)**. The sonographer course accreditation body recommends this as the minimum amount of clinical training required to

⁹ Australian Government Department of Health (2019) Modified Monash Model Factsheet. Available at: <https://www.health.gov.au/sites/default/files/documents/2020/07/modified-monash-model-fact-sheet.pdf>.

¹⁰ Medicare Statistics: http://medicarestatistics.humanservices.gov.au/statistics/mbs_group.jsp (Accessed December 2022).

¹¹ See ASAR Accredited Courses. Available at: <https://www.asar.com.au/course-accreditation/asar-accredited-courses/>.



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develop the medical knowledge and proficiency with ultrasound equipment necessary to be a sonographer.¹²

Due to the intensity of this training, this is typically an employed clinical training placement that students must secure themselves. There are also high numbers of people greater than the numbers enrolled who want to train to become sonographers. However, there are not enough clinical training placements available to increase student numbers.

Many private businesses cannot afford to commit senior sonographers to provide clinical supervision due to the dual cost to the business of employing the student as well as the lost revenue associated with a senior sonographer's reduced productivity due to supervision responsibilities. The ASA is receiving an increasing number of requests for help from students struggling to find placements who also report cases of employers seeking money from students to fund their own placements.

In the Skills Priority Survey conducted by the ASA, one employer indicated they recently advertised a single trainee position and received over 80 applications.

What is the solution?

The first step to addressing the workforce shortage is to introduce a solution that will quickly and efficiently support access to clinical training placements: without these, there will be no sonographer workforce in the future. As the work of sonographers is largely funded through Medicare, this is an important Commonwealth health issue.

As 75% of sonographers work in private practice, the Government should invest in training rebates in the form of wage subsidies or possible tax incentives paid to medical imaging sites that train sonographers.

Full or partial wage subsidies for sonographer clinical supervisors, either through payment to the business or tax subsidy, would reduce the financial and resource burden of providing clinical training placements. It is proposed that funding 30% of a sonographer clinical supervisor's wage would enable a private business to take on at least one additional student every six months. Government funding is sought to trial this solution at 15 private practices with the potential to make this available to more workplaces if the model proves successful. The model also takes into account room costs and opportunity costs for the designation of clinical supervisors.

The model would enable **an additional 30 sonographers every year** to commence supervised placements towards the fulfilment of their qualifications as accredited sonographers. Over three years, this would amount to 90 sonographers across Australia.

¹² ASAR. *Standards for the Accreditation of Sonographer Courses. Standard 3: Course Content. Version 3.* South Australia. 2019.



A recent study by the University of South Australia highlighted the inequalities of access to ultrasound services in rural and remote communities. The study found that a lack of ultrasound equipment and training for rural clinicians is contributing to higher death rates and fetal abnormalities in remote regions of Australia. These poorer perinatal outcomes are compounded by the costs of scans and travel, and limited awareness among pregnant rural women about the value of ultrasound.¹³

Given the particular inequalities in rural and remote areas, the ASA proposes that half the subsidised placements are made available to sites in rural and remote areas. This will serve to help create a more sustainable rural health workforce to address inequalities of access and outcomes.

To implement this solution, we need the Government to:

- invest \$3.466 million across three years to deliver wage assistance in 15 pilot sites.

What is the budget impact of the solution?

Initiative	2023–24 (\$m)	2024–2025 (\$m)	2025–2026 (\$m)	Total (\$m)
<i>Wage assistance for sonographer clinical supervisors</i>	0.585	0.600	0.615	1.8
<i>Opportunity cost for sonographer clinical supervisors</i>	0.292	0.300	0.308	0.9
<i>Cost of rooms</i>	0.216	0.222	0.228	0.666
<i>Total</i>				3.466

¹³ University of South Australia. Rural pregnant women in dire need of better ultrasound services. Available at: <https://www.unisa.edu.au/media-centre/Releases/2022/rural-pregnant-women-in-dire-need-of-better-ultrasound-services/>.