



the peak body and leading voice
for sonographers

Wednesday, 27 May 2020

Committee Secretary
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600

By email to covid.sen@aph.gov.au

Dear Senators,

Thank you for leading this vital work to consider the Australian Government's response to the COVID-19 pandemic.

Although the Australian Government's full response is still yet to be concluded, the Australasian Sonographers Association (ASA) would like to congratulate the governments of Australia in mitigating the initial impact of COVID-19 on the health of Australians, and its burden on the health system. The Governments' actions have saved the lives of many Australians.

In the last few months, a range of measures was deployed, which contributed to this success. Including the rationalisation of health services, enhanced local production and provision of personal protective equipment (PPE), and health workforce redeployment registers.

Now that we are moving toward the resumption of usual health services, it is an opportunity to reflect on how these measures can be improved in responding to the next national health emergency.

Thank you for taking the time to consider this information and for all of the Australian Government's leadership and good work in response to the COVID-19 pandemic. If you require any clarification or further information on the following, please contact James Brooks-Dowsett, Policy & Advocacy Advisor, on 0406 998 429 or by email to policy@sonographers.org.

We look forward to continuing to work with the Government for the health and wellbeing of all Australians.

Yours sincerely,

Ian Schroen
President of the ASA

Jodie Long
Chief Executive Officer

The Australasian Sonographers Association's submission to the Senate Select Committee inquiring into the Australian Government's response to the COVID-19 pandemic

Australia's Governments have shown exceptional leadership and action in the national response to the threat to Australians' health caused by the COVID-19 pandemic.

As the nation cautiously begins to resume usual health services, this Select Committee has an opportunity to recognise the excellent work that has been achieved in past months and to identify where we could strengthen our response to future national health emergencies.

Following are three areas with recommendations for the Committee that, through improved recognition of the essential role of medical diagnostic ultrasound and other medical imaging, Australia can strengthen its first response and workforce capacity to respond to national health emergencies.

The ASA recommends that, as we go forward post COVID-19 and in future national health emergency responses, the Australian Government agrees that:

1. Medical diagnostic ultrasound and other diagnostic medical imaging services are essential services when rationalisation of medical services is required in response to a state of emergency.
2. Sonographers require preferential access to personal protective equipment (PPE) as they face an unavoidable increased risk of infection and transmission when providing essential services during a pandemic
3. The Government can increase its ability to quickly boost the available sonographer workforce during times of crisis by nationally regulating sonographers by adding them to the existing Medical Radiation Practice Board of Australia

About the Australasian Sonographers Association

The Australasian Sonographers Association (ASA) is the peak body and leading voice for sonographers in Australia and New Zealand.

The ASA is the only professional association in Australasia that exclusively represents sonographers – the highly skilled health professionals that perform the majority of diagnostic medical ultrasound services.

With more than 6,300 members, the ASA represents more than 77 per cent of sonographers in Australia.

1. Medical diagnostic ultrasound and other diagnostic medical imaging services are essential services when rationalisation of medical services is required due to a state of emergency.

The rationalisation of Australia's health services in response to the pandemic was an essential step in building capacity of the sector should an uncontrolled outbreak occur. The Australian Government successfully led this through the National Cabinet.

When rationalising health services, it is imperative that the services required to respond to the emergency remain at full or enhance capacity, that the system can still respond to other emergency treatment as needed and the continuity of essential health services is maintained.

In March 2020, the Australasian Sonographers Association, together with the peak bodies of the other medical diagnostic imaging professions, wrote to Australia's Governments¹ to ensure that 1) *patients continued to have access to vital radiology services, and 2) private, and public clinical radiology departments and practices have access to personal protective equipment (PPE).*

Medical ultrasound provided by sonographers and other diagnostic imaging services has a central role in modern medicine across primary, secondary and tertiary healthcare. Medical imaging is needed to inform clinical decision-making by supporting diagnosis, treatment planning, monitoring and a range of interventional treatments for health conditions from pregnancy to cancer.

First responders such as doctors, nurses and paramedics were rightly the initial focus of the services to remain in place. However, this call on the Government recognised that the rationalisation of health services had not fully recognised the essential role of diagnostic imaging in supporting first responders, that diagnostic imaging was often the next necessary step in an emergency patient's care medical pathway, or that the majority of diagnostic imaging is provided outside of the public hospital system.

Fortunately, the broad actions of Australia's Governments have avoided the potential saturation of our public health system, and we are starting to resume the usual health services cautiously². However, the discussions about the emergency response to COVID-19 past and the resumption of service to come still doesn't fully recognise to critical support role that medical diagnostic imaging provides and the unique issues that private diagnostic imaging services face in protecting patients, sonographers and other staff, when delivering these essential services.

Recommended action:

- That medical diagnostic ultrasound, and other diagnostic medical imaging services, are recognised as essential services in a future national state of emergency responses.

¹ *COVID-19 Essential Role of Clinical Radiology Services Call for Action*. The Royal Australian and New Zealand College of Radiologists, NSW. Mar 2020

<https://www.sonographers.org/public/12/files/COVID19%20Essential%20Role%20of%20Clinical%20Radiology%20Services.pdf>

² *ASA Position Statement: Return of diagnostic imaging services during COVID-19*. The Australasian Sonographers Association, VIC. May 2020 https://www.sonographers.org/public/12/files/COVID-19/PUB_0830_ASA_Position_Statement_return-of-diagnostic-imaging-post-covid.pdf

2. Sonographers face an unavoidable increased risk of infection and transmission when providing essential services during a pandemic

Sonographers have an essential role, providing the medical diagnostic ultrasound examinations used to diagnose and treat patients.

Sonographers must have close face to face and physical contact for greater than 15 minutes when performing a medical ultrasound examination. Meaning that to do their job sonographers cannot adhere to the Government's recommended measures to reduce transmission of the coronavirus in healthcare settings³ without access to surgical masks and other PPE.

Other factors that increase sonographers' risk of infection⁴ include:

- The ultrasound room or enclosed area is typically small
- Ultrasound rooms often have restricted ventilation, as the air-conditioning systems are in some cases closed-loop and there are no windows
- In many examinations, patients are asked to inhale or exhale deeply and hold their breath, which also increases the risk of the patient coughing or sneezing
- The surfaces of the ultrasound machine, especially the keyboard, touch screen and trackball, are touched frequently.

During a declared state of emergency sonographers are essential to support essential health services, such as pregnancy. They also have a fundamental role providing acute services, such as ultrasound of the lung and transthoracic echocardiography that is required in treating COVID-19 infected patients.

Local⁵ and international^{6,7} medical bodies recognise that health professionals are at increased risk of COVID-19 infection when providing medical diagnostic ultrasound examinations and recommend the use of PPE during the examination.

Sonographer access to PPE is essential to protect sonographers and their colleagues and families. However, without regular and ongoing use of PPE, sonographers expose patients to an avoidable risk of infection⁸ due to the close face-to-face contact greater than 15 mins and regular physical interaction⁹ that is required during an ultrasound examination.

³ *Coronavirus Disease 2019 (COVID-19). CDNA National Guidelines for Public Health Units. Version 2.10.* Australian Government. 22 May 2020

⁴ *ISUOG Safety Committee Position Statement on use of personal protective equipment and hazard mitigation in relation to SARS-CoV-2 for practitioners undertaking obstetric and gynecological ultrasound.* International Society of Ultrasound in Obstetrics and Gynecology. 3 Apr 2020

⁵ *CSANZ Imaging Council Position Statement on Echocardiography Services During the COVID-19 Pandemic.* Cardiac Society of Australia & New Zealand. 30 Mar 2020

⁶ *Society of Radiographers. [Should sonographers wear PPE?](#)* United Kingdom. Accessed 16 Apr 2020.

⁷ *Open Letter to America - Lack of PPE for Sonographers During the COVID-19 Pandemic.* Society of Diagnostic Medical Sonography. 27 Mar 2020

⁸ *Media. [62 pregnant women kept under quarantine after sonographer tests positive for COVID-19.](#)* Daily Hunt. India. Accessed 17 Apr 2020

⁹ 'Close contact' definition: Department of Health. *Coronavirus Disease 2019 (COVID-19) CDNA National Guidelines for Public Health Units. Version 2.5.* Australian Government. 6 Apr 2020

In Australia, once the supply of PPE was secured, sufficient resources have not made available for the sonographers in private practices that deliver more than two-thirds¹⁰ of Australia's medical diagnostic ultrasound examinations.

We request that this inquiry recognise the unavoidable increased risk of infection and transmission that sonographers face when providing essential services during a pandemic and they need preferential access to PPE in Private and public diagnostic imaging services to protect patients and the sonographers, their colleagues and the wider community.

Recommended action:

- That the Government recognise the unavoidable increased risk of infection and transmission that faced by a sonographer
- Private and public diagnostic imaging services have access to increased PPE now and in future health emergencies.

¹⁰ 2017 *Employment and Salary Survey*. The Australasian Sonographers Association, VIC. Mar 2018

3. *Improve the available health workforce during health emergencies by including sonographers to the professions regulated by the Medical Radiation Practice Board of Australia*

After the pandemic was declared, to build capacity in the local health workforce, Australian state and territory governments established registers for health workers across a range of professions to be called upon as needed.

To support this, the Government's Australian Health Practitioner Regulation Agency (AHPRA) established a 'Pandemic sub-register' to help with fast-tracking the return to the workforce of experienced and qualified health practitioners.¹¹

This sub-register temporarily re-registered key health professionals whose registration had lapsed within three years, so that they could be redeployed locally to respond to the pandemic, boosting the number of health professionals that could be called upon across Australia.

Unfortunately, sonographers are the only diagnostic imaging profession that is not regulated by the AHPRA Medical Radiation Practice Board of Australia (MRPBA). This meant that this approach was very effective in boosting the radiographer health workforce that could be called upon, but not for sonographers.

For several years, the ASA has been advocating to regulate sonographers through the National Registration and Accreditation Scheme (NRAS) by adding the profession to the existing MRPBA¹² with the other medical imaging professions. This need was also recognised in the Senate at the end of last year.¹³

The national regulation of sonographer would address the patient protection and quality assurances that are currently missing when patients access medical diagnostic ultrasound services. it would also provide the Government increased ability to quickly boost the available sonographer workforce during times of crisis, as it was able to do for professions under AHPRA

Recommended action:

- The Committee agrees to the ongoing need and additional benefits of regulating sonographers through the National Registration and Accreditation Scheme by adding the profession to the existing Medical Radiation Practice Board of Australia.

¹¹ *Pandemic sub-register*. Australian Health Practitioner Regulation Agency, April 2020. Webpage: <https://www.ahpra.gov.au/News/COVID-19/Pandemic-response-sub-register.aspx>

¹² The ASA 2020–21 pre-budget submission to the Australian Government. The Australasian Sonographers Association, VIC. Dec 2019 https://www.sonographers.org/public/12/files/Budget%20Submissions/2020-21_Pre%20Budget%20Submission.pdf

¹³ Commonwealth, *Parliamentary Debates, House of Representatives, Motion No. 341*, 4 December 2019 (Senator Di Natale, Leader of the Greens)