



the peak body and leading voice
for sonographers

Tuesday 16 October 2018

Chief Health Officer and Deputy Director General
Prevention Division
Department of Health
Queensland Government

By email: MPBill@health.qld.gov.au

Dear Chief Health Officer and Deputy Director General,

RE: Medicines and Poisons in Queensland - Overview of the proposed regulatory scheme for Medicines and Poisons 2018 consultation

The ASA congratulates the Queensland Government on the significant work of the proposed Medicines and Poisons Bill 2018 (the Bill) and associated Regulations to establish a contemporary framework for the regulation of medicines, poisons and pest management in Queensland.

Notably the proposed includes significant changes for Queensland that will reduce or remove current barriers for a few new 'Eligible Persons' health professions; enabling them to provide their full scope of practice in the state. Disappointingly this is not the case for sonographers.

Sonographers

In most Australian jurisdictions the radiologist, as the authorised prescriber of the medications, can direct the sonographer to administer the Schedule 4 corticosteroid and local anaesthetic to treat a range of acute and chronic musculoskeletal conditions under ultrasound guidance.

Sonographers work in public hospital, private hospital and private practice settings; using ultrasound to provide diagnostic medical examinations as well as ultrasound guidance for interventional procedures such as corticosteroid injections.

The majority of sonographers routinely provide ultrasound guidance for a range of procedures. Nationally, a sub-group of sonographers routinely utilising ultrasound to administer corticosteroid injections under the direction of a radiologist for the treatment of a range of acute and chronic musculoskeletal conditions.

Sonographer ultrasound guided injections

In most other Australian jurisdictions medical professionals are able to delegate responsibility to sonographers to administer low risk ultrasound guided musculoskeletal injections.

Safe administration of medications and injections is not incorporated into entry-level training for sonographers. However, in these other Australian jurisdictions, sonographers undertake further education, workplace clinical training and assessment to develop and demonstrate competency to safely administer the medications for ultrasound guided musculoskeletal injections.

Importantly the sonographer only administers the medications under the direction of the prescriber and supervising medical professional. The medical professional remains the person responsible for interpreting the referral, assessing the clinical situation, assessing the risks and benefits of the procedures and assessing the safety to inject a pharmaceutical.

The medical practitioner also remains responsible for oversight of specifically trained staff, to confirm the patient has had an adequate description of the procedure, informed consent was obtained, and that adequate post procedure care information was provided. The medical practitioner remains responsible for applying their medical clinical reasoning skills in assessing the patient as a whole and determining that a therapeutic intervention is indicated and safe to perform.

Queensland sonographers

In Queensland, the only way that a sonographer can legally administer Schedule 4 medications is through a case-by-case approval provision of the *Health (Drugs and Poisons) Regulation 1996* (HDPR). Similar to other professions (e.g. speech pathologists) the only way that a sonographer can meet this requirement is through completion of additional training in safe administration of medicines to administer specific medicines.

The ASA commissioned a single course of training to build competency in experienced musculoskeletal sonographers to perform these roles. This education has been completed by a small cohort of Queensland sonographers.

For sonographers who have completed this training the only way they can continue to provide this service is by continuing to apply for and obtain these case-by-case approvals, and reapply as they expire.

Why this is important

It is important that radiologists have full scope to delegate work as they see appropriate, to manage their workflow for best patient access to all services they are responsible for, including the higher risk procedures and imaging services which they must personally perform.

Sonographers administering low risk ultrasound guided musculoskeletal injections is a safe and reliable system solution with recognised benefits including reducing patient waiting times, freeing up of radiologists for other duties, greater potential for recruitment and retention, cost-effectiveness, and higher levels of job satisfaction.

The stated objectives of the proposed Bill and Regulations are to:

1. Protect the public from harm
2. Prioritise expertise and training
3. Reduce red tape by modernising and simplifying the legislation
4. Improve flexibility for users of the system
5. Improve consistency with national laws

Permitting sonographers to possess and administer (specified) schedule 4 medicines on the instruction and under the supervision of a suitable medical practitioner satisfy all of these objectives:

1. The safety of the public remains prioritised as the medical professional remains in control of prescribing medications and determines the appropriateness of the service. This is complemented by an additional professional (the sonographer) with training specific to this health service.
2. A course of training in the safe administration of medicines has been developed to enable sonographers to safely administer medicines prior to performing these procedures.
3. Including sonographers in the current regulations would remove the existing regulatory processes that have to be repeated for sonographers to provide this service to Queenslanders.
4. Sonographer administered ultrasound guided injections improve patient access to these and other services as it empowers the radiologist to self-determine the best use of their time, and

builds their capacity for other essential responsibilities or higher risk health services, to meet patient needs. It is equally important for best patient access to services; and for the optimal use of diagnostic imaging and radiology professions.

5. In most Australian jurisdictions the radiologist, as the authorised prescriber of the medications, can direct the sonographer to administer the Schedule 4 corticosteroid and local anaesthetic to treat a range of acute and chronic musculoskeletal conditions under ultrasound guidance. For example, in NSW this has been in place for at least a decade.

Suggested amendment to the proposed regulations

This could simply be accommodated in the current proposed Bill and Regulations through the inclusion of Sonographers as an 'Eligible Person' in Chapter 2 of the proposed *Medicines and Poisons (Medicines) Regulation 2018*. This would be most appropriate at Part 2, Subdivision 8, Other Medical Professionals.

It is proposed that this amendment would authorise a sonographer who has:

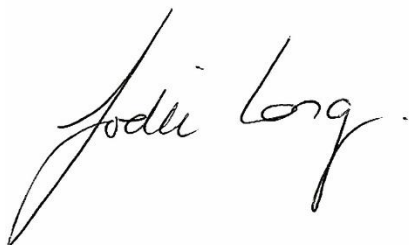
- current first aid management of anaphylaxis training and;
- completed a training course or program in the safe administration of medicines, which addresses specified competencies/modules approved by the chief executive, to:
 - administer the specified schedule 4 medicines (limited to local anaesthetics and corticosteroids) on the written instruction of an authorised prescriber to the extent necessary to practise sonography.

Thank you for the consultation on these important reforms and for taking the time to consider our feedback. Please note at this time we provide this information expecting it is kept confidential.

If you would like a version that can be published in the context of the consultation, or any additional information in support of the above, please contact James Brooks-Dowsett, ASA Policy & Advocacy Advisory, by phone on (03) 9550 0008, or email to policy@sonographers.org

I look forward to continuing to work with you on these proposed changes as they progress.

Your sincerely,

A handwritten signature in black ink that reads 'Jodie Long'.

Jodie Long
Chief Executive Officer
Australasian Sonographers Association