

## Rationale for Sonography Recommendations

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### Background:

The Government of Saskatchewan is considering a proposal to amend *The Medical Radiation Technologists Act, 2006* (Act) to allow for the regulation of diagnostic medical sonographers under the Saskatchewan Association of Medical Radiation Technologists (SAMRT).

This is a follow up consultation to the Stakeholder Consultation conducted in May 2019. In December 2019, following extensive consultation and two townhall education and feedback sessions with Saskatchewan sonographers, the Ministry of Health requested the SAMRT address concerns in the following three areas:

1. The protected titles for diagnostic medical sonographers, per section 22 of the Act.
2. The proposed name of the regulatory body
3. Proposed transition and governance of the diagnostic medical sonographers

Since January 2021, the SAMRT, together with SADMS and diagnostic medical sonographer members of Sonography Canada (SC) have developed recommendations for the proposed transition to regulate diagnostic medical sonographers (DMS) under the Act.

### Recommendations:

1. We have identified three potential organization names for stakeholder input.
2. We recommend the protected title of the health profession be “diagnostic medical sonographer” (DMS) and that it be added as a fifth discipline to the already regulated four disciplines.
3. We have outlined recommendations for the governance and transition of regulation of the additional discipline.

### Rationale:

#### **1. Name of the organization to reflect inclusion of diagnostic medical sonographers**

In considering options for a name, we sought to represent all five disciplines, and to clearly indicate to the public, our regulated members, and other key stakeholders what the role of the organization is.

An analysis of the names of twenty-seven regulated health professions in Saskatchewan revealed that there are seven variations in the names, with the majority beginning with the province, and ending with the name of the profession. A single other naming convention was identified (non-health related) that included the term regulatory “Saskatchewan Professional Teachers Regulatory Board (SPTRB).”

| Format                                  | Example  | #  |
|---|--|----|
| Saskatchewan + Association + Profession | Saskatchewan Association of Naturopathic Practitioners   | 10 |
| Saskatchewan + College + Profession     | Saskatchewan College of Midwives                         | 9  |
| Saskatchewan + Profession + Association | Saskatchewan Dental Assistants' Association              | 2  |
| Saskatchewan + Society + Profession     | Saskatchewan Society of Medical Laboratory Technologists | 2  |
| Profession + Society + Saskatchewan     | Denturist Society of Saskatchewan                        | 1  |
| Profession + Association + Saskatchewan | Chiropractors Association of Saskatchewan                | 2  |
| College + Profession + Saskatchewan     | College of Physicians and Surgeons of Saskatchewan       | 1  |
| Total                                   |  | 27 |

Through consultations, we learned that while the term technologist is used in the training programs for MRTs, it is not a word used to describe the training of sonographers. Therefore, it is more inclusive to use the term professional which can encompass all areas of diagnostic imaging.

The consultation included in this package provides an opportunity for stakeholders to provide feedback on three name options:

- A. The College of Medical Imaging and Radiation Therapy Professionals of Saskatchewan (CMIRTPS)
- B. The College of Medical Radiation and Imaging Professionals of Saskatchewan (CMRIPS)
- C. The Saskatchewan College of Medical Imaging and Radiation Therapy Professionals (SCMIRTP)

## 2. Protected title

The proposed protected title is “Diagnostic Medical Sonographer” with the abbreviation of “DMS.” The SAMRT does not have protection of scope; however, it does have protection of title, specified in section 22 of the Act:

No person other than a member shall use the title “Medical Radiation Technologist”, “Medical Radiological Technologist”, “Medical Radiation Therapist”, “Nuclear Medicine Technologist” or “Magnetic Resonance Technologist”, the abbreviation “RTR”, “RTT”, “RTMN” or “RTMR” or any word, title, or designation, abbreviated or otherwise, to imply that the person is a member.

| Specialty / Discipline        | Protected Title                   | Abbreviation |
|-------------------------------|-----------------------------------|--------------|
| Radiography                   | Medical Radiological Technologist | RTR          |
| Radiation Therapy             | Medical Radiation Therapist       | RTT          |
| Nuclear Medicine              | Nuclear Medicine Technologist     | RTMN         |
| Magnetic Resonance            | Magnetic Resonance Technologist   | RTMR         |
| Diagnostic Medical Sonography | Diagnostic Medical Sonographer    | DMS          |

A consistent approach to the protected title ensures a smooth labour mobility approach to DMS transferring across Canada. In Canada, DMS are regulated as an additional discipline with the Nova Scotia College of Medical Imaging and Radiation Therapy Professionals (NSCMIRTP), the College of Medical Radiation and Imaging Technologist of Ontario (CMRITO), the Order of Technologists in Medical Imaging, Radiation Oncology and Medical Electrophysiology of Quebec (OTIMROEPMQ) and upon proclamation with the Alberta College of Medical Diagnostic and Therapeutic Technologists (ACDMTT). Across Canada, the discipline is recognized as Diagnostic Medical Sonographers (DMS).

Sonography Canada recognizes three specialty certifications:

| Certification                              | Title | Specialty   |
|--|-------|---|
| Canadian Registered Generalist Sonographer | CRGS  | Generalist: physics, abdominal, obstetric, superficial structures, gynecology, carotids, venous leg and musculoskeletal imaging |
| Canadian Registered Cardiac Sonographer    | CRCS  | Cardiac Sonography: adult   |
| Canadian Registered Vascular Sonographer   | CRVS  | Vascular: arterial and venous imaging   |

Only members of SAMRT registered in a particular discipline are legally authorized to use that protected title. However, although these titles are protected, members are also encouraged to use their credentialed title in addition to the protected title. For example: DMS, CRGS or, DMS, CRCS or, DMS, CRVS. The same holds true for the specialty certifications MRTs have earned, for example RTMN, CTIC, PET/CT or, RTR, CIR.

### 3.a Governance revisions for inclusion of sonographers

This table details recommendations related to the Act, Bylaws or Policies of the SAMRT. Note this is not intended to be a side by side of proposed amendments; rather it highlights recommendations for areas to be addressed through a formal amendment application should the application move forward. Any amendments would be circulated through the normal legislation consultation process.

In general, recommendations 1– 10 pertain to registration requirements already in place for MRTs and recommend applying same requirements for DMS and include details regarding accredited education programs and certification exams.

Recommendations 11 – 13 introduce recommendations for the transitioning “grandparent” phase, as well as recommendations for additional representation of DMS on Council and Legislated Committees.

| <b>Committee Recommendations</b> |   | <b>Rationale</b>   |
|----------------------------------|---|--|
| 1                                | <p><b>Registration - Discipline title and abbreviation:</b><br/>That the discipline title for sonographers be ‘Diagnostic Medical Sonographer’ and the abbreviation be “DMS”.</p> <p>That DMS be added as a fifth discipline and that the three subspecialties of sonography (general, cardiac, and vascular) all be considered as one discipline.</p> <p>Act. s. 22 – Protection of Title<br/>Regulatory Bylaws s. 2 Definition of Discipline.</p>         | <p>Consistent with MRT title approach for title and discipline certification in SK and pan-Canadian.</p> <p>Provides ease for labor mobility.</p> <p>Individuals are encouraged to also use their certification and subspecialty titles.</p>   |
| 2.                               | <p><b>Registration regulation: General requirements:</b><br/>That the general registration requirements set out in the registration regulation be applicable to the specialty of DMS.</p> <p>Act s. 20 – general terms of registration requirements.</p>  | <p>Specifies that the requirements applicable to MRTs will also apply to the sonographers.</p>   |
| 3                                | <p><b>Registration regulation - Conditions of registration – PLI:</b><br/>That the conditions of registration requirements set out in the registration regulation including the professional liability insurance (PLI) criteria be applicable to the specialty of DMS.</p> <p>Regulatory Bylaw s. 18</p>  | <p>Ensures consistency in PLI requirements for all disciplines.</p>  |
| 4                                | <p><b>Registration regulation - Educational programs</b><br/>That the education program be accredited and approved by the Council.</p> <p>Regulatory Bylaw s. 3</p>   | <p>Ensures that only accredited education programs in Canada will be accepted for entry to practice and registration for all disciplines.</p>  |
| 5                                | <p><b>Registration regulation – Examination:</b></p> <ol style="list-style-type: none"> <li>1. That applicants be required to successfully complete the examination set or approved by Council in the specialty of DMS; and</li> <li>2. That the Sonography Canada certification examination in one of the three subspecialties of general, cardiac, and vascular be approved by policy as the approved examination.</li> </ol> <p>Regulatory Bylaw s.4</p> | <p>Provides clarity for sonographers about exam certification requirements and ensures consistent requirements for all disciplines.</p> <p>This means that the American Registry of Diagnostic Medical Sonographers (ARDMS) examination will not be an approved examination for the purposes of entry to practice to the profession.</p> |
| 6                                | <p><b>Registration regulation - Currency of practice and continuing education:</b><br/>That the requirement that an applicant must have engaged in clinical practice in the specialty or completed an educational program within the five years before the date of the application, with a minimum of 1,200 practice hours (or have graduated</p>   | <p>Ensures DMS engaging in clinical practice have been in active practice in the preceding five years (or 3 years for recent graduates) meet the practice hour and continuing education requirements set out in the regulatory bylaws.</p>   |

| Committee Recommendations  | Rationale  |
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| <p>within the preceding 3 years) be applicable to the specialty of DMS.<br/>Regulatory Bylaw 13.1 a. AND<br/>In the case of an application for a renewal of a licence, the individual has completed a total of 10 continuing education credits in the previous 12 months.<br/>Regulatory Bylaw 13.1.b.</p>   |  |
| <p>7 <b>Registration regulation - Out of province requirements</b><br/>That an individual registered as the equivalent of a diagnostic medical sonographer in good standing pursuant to the legislation of another jurisdiction in Canada be eligible for registration in Saskatchewan.<br/>Act 20(1.1) (c) addresses MRT equivalents</p>  | <p>An amendment to the Act to add diagnostic medical sonographers to ensure labour mobility be applicable to the specialty of DMS.</p>   |
| <p>8 <b>Licence Required</b><br/>That the regulation stipulating every member is required to obtain a licence in each year in order to practice and that a member who does not obtain or renew a licence cease to be licensed and is not entitled to practise or work as a member as of January 1 of the year for which the licence is required be applicable to the specialty of DMS.<br/>Regulatory Bylaw s. 12.2 and 12.3</p> | <p>Specifies the licence requirements and implications for failure to obtain or renew.</p>   |
| <p>9 <b>Code of Ethics:</b><br/>That the requirement that every member shall comply with the Code of Professional Conduct be applicable to the specialty of DMS.<br/>The Code of Ethics document should be reviewed and updated within 12 months of proclamation by a committee that includes the Registrar, MRT and DMS.<br/>Regulatory Bylaw s. 19</p>   | <p>Specifies that the requirements applicable to MRTs will also apply to the sonographers.</p>   |
| <p>10 <b>Scope and Standards of Practice</b><br/>That the requirement that every member shall comply with the Scope and Standards of Practice policies be applicable to the specialty of DMS.<br/>This document should be reviewed and updated within 12 months of proclamation by a committee that includes the Registrar, MRT and DMS.</p>   | <p>Specifies that the requirements applicable to MRTs will also apply to the sonographers.<br/>Note however, for one specific medical care activity – Sonography Canada (SC) does not have a credential for Pediatric Echocardiography/Pediatric Diagnostic Cardiac Sonography. Pediatric echo is specially excluded from the CRCS credential, and Pediatric echo is not</p> |

| Committee Recommendations |  | Rationale   |
|---------------------------|--|---|
|                           |  | included in the education or training for CRCS. This credential is only available through ARDMS. SC considers pediatric echo to be a delegated act. This may warrant a special statement in the Scope and Standards of Practice with set requirements for education and training. |
| 11                        | <p><b>Registration regulation - Grandparenting of practitioners</b></p> <p>That the grandparenting provisions outlined in the “Proposed approach for Diagnostic Medical Sonography transition period licensing criteria” (in 3.b below) be applicable to the specialty of DMS for a limited period to be determined upon proclamation.</p>   | This means that existing DMS practitioners who can meet the terms of provisions will be registered with SAMRT without any additional training or examination requirements during transition period and provides details of the transition to become licensed.                     |
| 12                        | <p><b>Council - Number and Composition of Elected Council</b></p> <p>That for a three-year term, following proclamation, one additional observer position be added, and the position be filled by an appointed DMS member. Administration Bylaws s. 8</p>  | <p>Note this will have no effect on the government appointed public representatives.</p> <p>This ensures representation of DMS until they are eligible to run for an elected position.</p>  |
| 13                        | <p><b>Legislated Committees - Number and Composition of Professional Conduct and Discipline Committee:</b></p> <p>That for a three-year term, following proclamation, one additional position be added to both committees, and the position be filled by an appointed DMS member. Upon completion of the term, and consideration of the Committee Chair and Council, the position may be reappointed, or the number of representatives be reduced to its former level. Act s. 25(1) (PCC) and s. 28 (1) (Discipline)</p> | This ensures representation of DMS for the legislated committees in the early years of regulation. The Act currently specifies minimum number of 3 be appointed but does not stipulate representation of all disciplines.   |

### 3.b Proposed approach for diagnostic medical sonography transition period licensing criteria

Until XXXX date there will be a transition period that will allow any DMS that meets one of the following criteria to be eligible to licence in Saskatchewan:

1. A person who is an active credentialed member of Sonography Canada.
2. A person who has been certified to practice diagnostic medical sonography by the American Registry for Diagnostic Medical Sonographers, and who has engaged in the practice of diagnostic medical sonography in Saskatchewan during the past 12 months.
3. A person who, has engaged in the practice of diagnostic medical sonography in Saskatchewan for 1,200 practice hours in the last five years OR 300 hours in the past three years for a secondary discipline/new graduate.
4. Graduated from an accredited DMS program in Canada and passed the national entry to practice exams.
5. Currently is licenced as a DMS in a regulated province. (Ontario or Nova Scotia).

After XXXX date only those DMS that meet criteria #4 or #5 above will be eligible for licensing in Saskatchewan as a diagnostic medical sonographer. We encourage those DMS that may wish to work in Saskatchewan at a future time that are currently eligible under conditions #1, #2, or #3 above to apply for registration with the SAMRT prior to XXXX date. DMS who register under the transition criteria would be asked to submit required documents and pay an application fee and the annual licence fee. They are then free to resign in good standing and in the future remain eligible to apply for reinstatement.

### **Public Protection**

- The mandate of the SAMRT is to serve and protect the public by making sure that its members are qualified to practice and are practising professionally. Through the inclusion of diagnostic medical sonographers, our goal is to strengthen the safety, quality, oversight and transparency of medical radiation and imaging services by:
  - setting and enforcing standards of practice, ethics, guidelines, and policies for the practice and conduct of members;
  - registering only those individuals who have met the educational and examination requirements for competent practice before they can practice or use the professional title;
  - requiring members to maintain continuous education (CE) credits (credits already required by the American Registry for Diagnostic Medical Sonography (ARDMS) or Sonography Canada are eligible for SAMRT CE);
  - addressing complaints and concerns from the public, patients, and employers regarding professional conduct issues through its complaints and discipline process; and
  - providing current information about each member's registration status and past conduct to the public on its website.