

# Stakeholder Feedback on the Regulation of Diagnostic Sonographers under the *Regulated Health Professions Act, 1991* (RHPA)

## Part I: Survey Submissions

### Note:

The responses within have not been edited by the Health Professions Regulatory Advisory Council (HPRAC). HPRAC is not responsible for any errors and omissions found on the submissions. Stakeholder comments are posted according to access to information guidelines (for guidelines visit, <http://www.hprac.org/en/privacy.asp>)

Health Professions Regulatory Advisory Council (HPRAC)



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## Introduction:

As part of its decision-making process, HPRAC invited organizations and individuals to participate in a survey regarding the Ontario Association of Medical Radiation Sciences' (OAMRS) application for self-regulation of diagnostic sonographers under the *Regulated Health Professions Act, 1991* (RHPA). Consultation opened on October 15, 2013 and closed on January 15, 2014. The survey questions were aligned with HPRAC's criteria for regulating a new health profession under the RHPA.<sup>1</sup>

A link to an online survey was posted on HPRAC's website and stakeholders submitted comments through this route; or by completing the survey and manually sending it into the HPRAC office; or by providing their views in the form of a letter.

HPRAC's consultation process is expected to crystallize broad themes and unanticipated issues; it is not viewed as a quantitative source of stakeholder interests or concerns.

By the close of consultation, 164 stakeholders made submissions to HPRAC:

- 161 submissions were in survey form, either submitted online or directly to the HPRAC office. Part I of the stakeholder feedback focuses on these submissions.
- 7 submissions were in the form of a letter. Part II of the stakeholder feedback focuses on these submissions.

In total HPRAC received 168 submissions.<sup>2</sup>

The following organizations provided a submission to HPRAC regarding the regulation of diagnostic sonographers:

- Alberta College of Medical Diagnostic and Therapeutic Technologists
- Alberta Diagnostic Sonographer's Association
- Aylmer Ultrasound Inc.
- College of Medical Radiation Technologists of Ontario
- College of Nurses of Ontario
- College of Physicians and Surgeons of Ontario
- Educational institution (unspecified)
- Guelph General Hospital
- Health sector interest group/association (unspecified)
- The Hospital for Sick Children
- Mohawk College

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<sup>1</sup> To view this document see:

[http://www.hprac.org/en/reports/resources/RegulatingaNewProfession\\_CriteriaProcess\\_Nov2011.pdf](http://www.hprac.org/en/reports/resources/RegulatingaNewProfession_CriteriaProcess_Nov2011.pdf)

<sup>2</sup> One organization provided both a survey and a written response. Two separate organizations provided more than one survey response. All survey responses are reported within Part 1 and all written responses are reported within Part 2.

- North York General Hospital
- Ontario Medical Association
- Ontario Society of Cardiology Technologists
- Provincial Council for Maternal and Child Health
- Royal College of Dental Surgeons of Ontario
- Royal Victoria Regional Health Centre
- Sonography Canada (formerly Canadian Society of Diagnostic Medical Sonographers & Canadian Association of Registered Diagnostic Ultrasound Professionals)
- Unregulated health professional association (unspecified)

### Summarized results:

Of the 161 submissions that followed the survey format, 145 (90%) were from individuals and 16 (10%) were from organizations. Stakeholders indicated their position on the regulation of diagnostic sonographers under the RHPA by, among other things, commenting on the following questions<sup>3</sup>:

<b>Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?</b>			
	<b>Number (%) of “yes” responses</b>	<b>Number (%) of “no” responses</b>	<b>Total</b>
<b>Individual</b>	132 (82%)	13 (8%)	145(90%)
<b>Organization</b>	16 (10%)	0 (0%)	16 (10%)
<b>Total</b>	148 (92%)	13 (8%)	161 (100%)
<b>Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA?</b>			
	<b>Number (%) of “yes” responses</b>	<b>Number (%) of “no” responses</b>	<b>Total</b>
<b>Individual</b>	129 (80%)	16 (10%)	145 (90%)
<b>Organization</b>	16 (10%)	0 (0%)	16 (10%)
<b>Total</b>	145 (90%)	16 (10%)	161 (100%)
<b>Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession?</b>			
	<b>Number (%) of “yes” responses</b>	<b>Number (%) of “no” responses</b>	<b>Total</b>
<b>Individual</b>	130 (81%)	15 (9%)	145 (90%)
<b>Organization</b>	16 (10%)	0 (0%)	16 (10%)
<b>Total</b>	146 (91%)	15 (9%)	161 (100%)

Submissions, provided by organizations, can be viewed in the section that follows. Some individuals also provided additional comments in the final question of the survey. These comments can be viewed in Table 1.

<sup>3</sup> +/- 1% variance due to rounding

**Organizations' Submissions**

# Alberta College of Medical Diagnostic and Therapeutic Technologists

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is

(optional) First name

Kathy

Last Name

Hilsenteger

Phone (optional)

7804876130

Email address (optional)

khilsenteger@acmdtt.com

Geographical location (optional)

»Alberta

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health professions regulatory college

Organization name (optional)

Alberta College of Medical Diagnostic and Therapeutic Technologists

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 »Yes

---

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 »Yes

---

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
- ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 3
- iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 1
- iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
- v) Sufficient evidence was presented regarding risk of harm. 0
- vi) Regulation is required due to the vulnerability of the patient population. 0
- vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
- viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 2
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
- x) Other 0

Rank values must be between 1 and 3

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The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
- ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
- iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
- iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
- v) Insufficient evidence was presented regarding risk of harm.
- vi) The professions' patient population does not require special protection.
- vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
- viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
- x) Other

Rank values must be between 1 and 3

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4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *					<b>x</b>
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *					<b>x</b>

v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *				<b>x</b>	
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *					<b>x</b>
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *			<b>x</b>		

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care.	1
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.	0
iii) The profession's practice is supported by a distinct body of evidence-based knowledge.	3
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation.	0
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession.	4
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA.	5
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions.	0
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers.	0
ix) Regulation of the profession will enhance access to safe, high-quality care.	2
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times).	0
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).	0
xii) Sufficient evidence was presented regarding the appropriateness of regulation.	0
xiii) The current certification process for members of the profession is inadequate.	0
xiv) The current supervision and oversight procedures and processes are insufficient.	0
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities.	0
xvi) Other	0

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.
iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
ix) Regulation of the profession will not enhance access to safe, high-quality care.
x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
  - xiii) The current certification process for members of the profession is adequate.
  - xiv) The current supervision and oversight procedures and processes are sufficient.
  - xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *					<b>x</b>
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *					<b>x</b>
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *			<b>x</b>		
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *			<b>x</b>		
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *					<b>x</b>
xiii) The current certification process for members of the profession is adequate. *					<b>x</b>
xiv) The current supervision and oversight procedures and processes are sufficient. *		<b>x</b>			
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *				<b>x</b>	

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

The Alberta College of Medical Diagnostic and Therapeutic Technologists supports regulation and agrees that this will protect the public of Ontario by enabling the development and enforcement of mandatory registration, entry to practice requirements, standards of practice and a continuous quality improvement program for individuals practicing diagnostic medical sonography.

As sonographers are not regulated at this time, there is no centralized formal process to make or investigate complaints. The public is forced to direct its complaints to the employer of the diagnostic medical sonographer, resort to a civil justice system and often depend on the media to raise attention to the issue. As a result complaints are decentralized and there is a lack of barriers preventing unethical practitioners from moving their practice between locales or settings. Regulation would enable members of the public and other key stakeholders such as employers to verify a practitioner's registration status and professional standing through a public registry.

Self-governance is a feasible option for the profession given the proposal for regulation under the umbrella of the CMRTO. A single regulatory body (as differentiated from member advocacy bodies) for diagnostic imaging services, with a clear public interest mandate, will also play a role in educating the public regarding the roles of different modalities/technical specialty providers and the role of imaging when receiving care from the health care system - thereby improving public confidence in the health care system.

# Alberta Diagnostic Sonographers Association

## Submission 1

### Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council

(HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is

(optional) First name

Ellen

Last Name

Johnstone

Phone (optional)

Email address (optional)

Ellen.Johnstone@covenanthealth.ca

Geographical location (optional)

»Alberta

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»General interest group/association

Organization name (optional)

ADSA -Alberta Diagnostic Sonographers Association

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 1
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 2
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 3
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 0
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
  - viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 0
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
  - x) Other 0
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
  - ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
  - iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
  - iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
  - v) Insufficient evidence was presented regarding risk of harm.
  - vi) The professions' patient population does not require special protection.
  - vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
  - viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
  - x) Other
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *		<b>x</b>			
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *				<b>x</b>	
v) Sufficient evidence was presented regarding risk of harm. *				<b>x</b>	

v) Sufficient evidence was presented regarding risk of harm. *				<b>x</b>	
vi) Regulation is required due to the vulnerability of the patient population. *				<b>x</b>	
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *			<b>x</b>		
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *				<b>x</b>	
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- |  |   |
|--|---|
| i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care.  | 5 |
| ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.  | 3 |
| iii) The profession's practice is supported by a distinct body of evidence-based knowledge.  | 0 |
| iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation.  | 0 |
| v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession.   | 0 |
| vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA.   | 1 |
| vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions.  | 0 |
| viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers.   | 0 |
| ix) Regulation of the profession will enhance access to safe, high-quality care.   | 2 |
| x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). | 0 |
| xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).   | 0 |
| xii) Sufficient evidence was presented regarding the appropriateness of regulation.  | 0 |
| xiii) The current certification process for members of the profession is inadequate.   | 0 |
| xiv) The current supervision and oversight procedures and processes are insufficient.  | 0 |
| xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities.         | 4 |
| xvi) Other   | 0 |

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- |  |  |
|--|--|
| i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.   |  |
| ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.  |  |
| iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.  |  |
| iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.  |  |
| v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.   |  |
| vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.                                   |  |
| vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.  |  |
| viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.   |  |
| ix) Regulation of the profession will not enhance access to safe, high-quality care.   |  |
| x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times). |  |
| xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).   |  |

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
  - xiii) The current certification process for members of the profession is adequate.
  - xiv) The current supervision and oversight procedures and processes are sufficient.
  - xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *				<b>x</b>	
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *				<b>x</b>	
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *				<b>x</b>	
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *				<b>x</b>	
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *			<b>x</b>		
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *				<b>x</b>	
xiii) The current certification process for members of the profession is adequate. *		<b>x</b>			
xiv) The current supervision and oversight procedures and processes are sufficient. *				<b>x</b>	
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *				<b>x</b>	

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

In Alberta ADSA has applied and been accepted under the ACMDTT umbrella to apply for Sonography regulation under the HPA ( Health Professions ACT) and are in the process of completing the submission of required documents by Jan 30th ,2014 . It has been x2 recommended by the ADSA membership to seek regulation primarily due to the issue of RISK of Harm to the patients and public with restricted activities and ensuring that all sonographers are competent in their abilities to provide images that give an accurate diagnosis . We are hoping that the HPA will be opened this spring and that after 3 tries at regulation for sonographers as a Profession we are successful . We wish the Ontario group all the best in reaching their Goal

Ellen Johnstone ADSA President 2010-2014

# Alberta Diagnostic Sonographers Association

## Submission 2

### Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is

(optional) First Name

Karen

Last Name

Rivers

Phone (optional)

7804490602

Email address (optional)

karemr@nait.ca

Geographical location

(optional) »Alberta

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Unregulated health professional association

Organization name (optional)

Alberta Diagnostic Sonographer's Association

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

» Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 1
- ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
- iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 2
- iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
- v) Sufficient evidence was presented regarding risk of harm. 0
- vi) Regulation is required due to the vulnerability of the patient population. 0
- vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
- viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 3
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
- x) Other 0

Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
- ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
- iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
- iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
- v) Insufficient evidence was presented regarding risk of harm.
- vi) The professions' patient population does not require special protection.
- vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
- viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
- x) Other

Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *	<b>x</b>				
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *					<b>x</b>

v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *					<b>x</b>
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *					<b>x</b>
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *					<b>x</b>

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. 4
- ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. 0
- iii) The profession's practice is supported by a distinct body of evidence-based knowledge. 0
- iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 0
- v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. 3
- vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 2
- vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 0
- viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
- ix) Regulation of the profession will enhance access to safe, high-quality care. 1
- x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). 0
- xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). 0
- xii) Sufficient evidence was presented regarding the appropriateness of regulation. 0
- xiii) The current certification process for members of the profession is inadequate. 0
- xiv) The current supervision and oversight procedures and processes are insufficient. 0
- xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities. 5
- xvi) Other 0

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
- ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.
- iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
- iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
- v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
- vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
- vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
- viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
- ix) Regulation of the profession will not enhance access to safe, high-quality care.
- x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
- xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
- xiii) The current certification process for members of the profession is adequate.
- xiv) The current supervision and oversight procedures and processes are sufficient.
- xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
- xvi) Other

Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *				<b>x</b>	
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *					<b>x</b>
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *					<b>x</b>
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *		<b>x</b>			
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *		<b>x</b>			
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *					<b>x</b>
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *					<b>x</b>
xiii) The current certification process for members of the profession is adequate. *					<b>x</b>
xiv) The current supervision and oversight procedures and processes are sufficient. *					<b>x</b>
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *			<b>x</b>		

# Aylmer Ultrasound Inc.

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

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For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Laura

Last Name

Annaert

Phone (optional)

Email address (optional)

Annaert@rogers.com

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health services organization

Organization name (optional)

Aylmer Ultrasound Inc.

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 2
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 1
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 0
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
  - viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 3
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
  - x) Other 0
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
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  - v) Insufficient evidence was presented regarding risk of harm.
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  - viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
  - x) Other
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *	<b>x</b>				
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *				<b>x</b>	

v) Sufficient evidence was presented regarding risk of harm. *				<b>x</b>	
vi) Regulation is required due to the vulnerability of the patient population. *				<b>x</b>	
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *					<b>x</b>
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

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ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.	2
iii) The profession's practice is supported by a distinct body of evidence-based knowledge.	3
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation.	0
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession.	0
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA.	0
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions.	4
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers.	0
ix) Regulation of the profession will enhance access to safe, high-quality care.	5
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times).	0
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).	0
xii) Sufficient evidence was presented regarding the appropriateness of regulation.	0
xiii) The current certification process for members of the profession is inadequate.	0
xiv) The current supervision and oversight procedures and processes are insufficient.	0
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities.	0
xvi) Other	0

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

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ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.	
iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.	
iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.	
v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.	
vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.	
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  - xvi) Other
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7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *				<b>x</b>	
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *					<b>x</b>
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *			<b>x</b>		
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *			<b>x</b>		
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *			<b>x</b>		
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *			<b>x</b>		
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *				<b>x</b>	
xiii) The current certification process for members of the profession is adequate. *				<b>x</b>	
xiv) The current supervision and oversight procedures and processes are sufficient. *				<b>x</b>	
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *				<b>x</b>	

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

Sonographers trained at an accredited Canadian school provide the health care team with a wealth of critical diagnostic information that is of great value in the delivery of care. If inaccurately evaluated, an ultrasound examination will very likely cause significant errors in the delivery of care as per Canadian standards, and per the established accuracy and reliability of the technology. Any health care provider entrusted with such responsibility and specific technical skill set should be both recognized for their valuable contribution, and regulated to maintain their value to the delivery of care. The continued apathy and procrastination in addressing this issue (20 -plus years) is unacceptable. Canadians should be appalled that the beautician who waxes their eyebrows is more strictly regulated than the professional evaluating the blood vessels of the heart of their developing fetus or searching for a tumour in her breast. Canadians deserve this. Sonographers have long lobbied for this. It's time.

Respectfully,  
Laura Annaert

# Educational institution

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

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To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

Geographical location (optional)

»Ontario

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Contact Information

I am responding \*

»On behalf of an organization

---

Type of employer/organization \*

»Educational institution

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1)Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

»Yes

---

2)Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*

»Yes

---

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

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3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
- ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 2
- iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 1
- iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
- v) Sufficient evidence was presented regarding risk of harm. 0
- vi) Regulation is required due to the vulnerability of the patient population. 3
- vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
- viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 0
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
- x) Other 0

Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
- ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
- iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
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- v) Insufficient evidence was presented regarding risk of harm.
- vi) The professions' patient population does not require special protection.
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Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *	<b>x</b>				
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *					<b>x</b>
v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *					<b>x</b>
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *					<b>x</b>
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *					<b>x</b>

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

- 6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*
- i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. 1
  - ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. 2
  - iii) The profession's practice is supported by a distinct body of evidence-based knowledge. 0
  - iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 5
  - v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. 4
  - vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 3
  - vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 0
  - viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
  - ix) Regulation of the profession will enhance access to safe, high-quality care. 0
  - x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). 0
  - xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). 0
  - xii) Sufficient evidence was presented regarding the appropriateness of regulation. 0
  - xiii) The current certification process for members of the profession is inadequate. 0
  - xiv) The current supervision and oversight procedures and processes are insufficient. 0
  - xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities. 0
  - xvi) Other 0
- Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

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- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
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  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills					<b>x</b>

and competencies necessary to deliver safe and competent care on entry to the profession. *					
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *					<b>x</b>
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *					<b>x</b>
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *					<b>x</b>
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
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xiv) The current supervision and oversight procedures and processes are sufficient. *					<b>x</b>
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *					<b>x</b>

# Guelph General Hospital

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Last Name

Phone (optional)

Email address (optional)

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health services organization

Organization name (optional)

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 »Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 »Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 1
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 0
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  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 0
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- Rank values must be between 1 and 3

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4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *				x	
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vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA.	0
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions.	0
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers.	0
ix) Regulation of the profession will enhance access to safe, high-quality care.	5
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xiv) The current supervision and oversight procedures and processes are insufficient.	0
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Rank values must be between 1 and 5

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7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *				<b>x</b>	
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v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *				<b>x</b>	
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viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *				<b>x</b>	
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *		<b>x</b>			
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# Health sector interest group/association

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

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My name is (optional)

First Name

Last Name

Phone (optional)

Email address (optional)

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health sector interest group/association

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

» Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*

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The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
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- vi) Regulation is required due to the vulnerability of the patient population. 0
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Rank values must be between 1 and 3

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4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *				<b>x</b>	
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vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
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Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
- ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.
- iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
- iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
- v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
- vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
- vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
- viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
- ix) Regulation of the profession will not enhance access to safe, high-quality care.
- x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
- xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).
- xii) Insufficient evidence was presented regarding the appropriateness of regulation.

xiii) The current certification process for members of the profession is adequate.

xiv) The current supervision and oversight procedures and processes are sufficient.

xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.

xvi) Other

Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *			<b>x</b>		
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *			<b>x</b>		
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *			<b>x</b>		
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *				<b>x</b>	
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *				<b>x</b>	
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *				<b>x</b>	
xiii) The current certification process for members of the profession is adequate. *		<b>x</b>			
xiv) The current supervision and oversight procedures and processes are sufficient. *	<b>x</b>				
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *	<b>x</b>				

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

diagnostic sonographers require a regulatory body to oversee and outline our responsibilities so that the roles and duties of a sonographer can be defined more adequately. Without regulation of the profession, risk is posed to the public as uncertified 'sonographers' without adequate training are performing ultrasounds for the public.

# The Hospital for Sick Children

## Submission 1

### Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Last Name

Phone (optional)

Email address (optional)

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health services organization

Organization name (optional)

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 1
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 2
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 0
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 3
  - viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 0
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
  - x) Other 0
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
  - ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
  - iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
  - iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
  - v) Insufficient evidence was presented regarding risk of harm.
  - vi) The professions' patient population does not require special protection.
  - vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
  - viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
  - x) Other
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *		<b>x</b>			
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *					<b>x</b>

v) Sufficient evidence was presented regarding risk of harm. *				<b>x</b>	
vi) Regulation is required due to the vulnerability of the patient population. *				<b>x</b>	
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *					<b>x</b>
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *				<b>x</b>	
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. 1
- ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. 0
- iii) The profession's practice is supported by a distinct body of evidence-based knowledge. 0
- iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 5
- v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. 4
- vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 3
- vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 0
- viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
- ix) Regulation of the profession will enhance access to safe, high-quality care. 2
- x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). 0
- xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). 0
- xii) Sufficient evidence was presented regarding the appropriateness of regulation. 0
- xiii) The current certification process for members of the profession is inadequate. 0
- xiv) The current supervision and oversight procedures and processes are insufficient. 0
- xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities. 0
- xvi) Other 0

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
- ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.
- iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
- iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
- v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
- vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
- vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
- viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
- ix) Regulation of the profession will not enhance access to safe, high-quality care.
- x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
- xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
  - xiii) The current certification process for members of the profession is adequate.
  - xiv) The current supervision and oversight procedures and processes are sufficient.
  - xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *				<b>x</b>	
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *				<b>x</b>	
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *				<b>x</b>	
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *				<b>x</b>	
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *					<b>x</b>
xiii) The current certification process for members of the profession is adequate. *			<b>x</b>		
xiv) The current supervision and oversight procedures and processes are sufficient. *			<b>x</b>		
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *				<b>x</b>	

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

Regulation will provide a consistent standard of training and education to provide quality care. In a hospital environment the sonographers have to meet a certain standard of education but in the private sector, this is varied. Sonographers should be in the category of regulated professions as are other health professionals that they work with.  
SickKids supports the regulation of the ultrasound professionals.

# The Hospital for Sick Children

## Submission 2

### Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

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To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Luc

Last Name

Trottier

Phone (optional)

416-813-6073

Email address (optional)

luc.trottier@sickkids.ca

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health services organization

Organization name (optional)

The Hospital for Sick Children

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- |  |   |
|--|---|
| i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public.  | 1 |
| ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm.                          | 0 |
| iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health.                           | 2 |
| iv) The practice environment gives rise to a significant potential for physical or mental harm to the public.  | 0 |
| v) Sufficient evidence was presented regarding risk of harm.   | 0 |
| vi) Regulation is required due to the vulnerability of the patient population.   | 3 |
| vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA.                                   | 0 |
| viii) Regulation is required because the practice of the profession involves the performance of controlled acts.   | 0 |
| ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. | 0 |
| x) Other   | 0 |
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- |   |
|---|
| i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.                                     |
| ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.                             |
| iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.                                   |
| iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.   |
| v) Insufficient evidence was presented regarding risk of harm.  |
| vi) The professions' patient population does not require special protection.  |
| vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.  |
| viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.  |
| ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA. |
| x) Other  |
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *					<b>x</b>
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *				<b>x</b>	

v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *					<b>x</b>
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *					<b>x</b>
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *					<b>x</b>

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. 0
- ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. 0
- iii) The profession's practice is supported by a distinct body of evidence-based knowledge. 0
- iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 0
- v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. 4
- vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 3
- vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 0
- viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
- ix) Regulation of the profession will enhance access to safe, high-quality care. 1
- x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). 0
- xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). 2
- xii) Sufficient evidence was presented regarding the appropriateness of regulation. 5
- xiii) The current certification process for members of the profession is inadequate. 0
- xiv) The current supervision and oversight procedures and processes are insufficient. 0
- xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities. 0
- xvi) Other 0

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
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- iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
- iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
- v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
- vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
- vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
- viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
- ix) Regulation of the profession will not enhance access to safe, high-quality care.
- x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
- xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
- xiii) The current certification process for members of the profession is adequate.
- xiv) The current supervision and oversight procedures and processes are sufficient.
- xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
- xvi) Other

Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *				<b>x</b>	
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *				<b>x</b>	
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *				<b>x</b>	
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *					<b>x</b>
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *					<b>x</b>
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *					<b>x</b>
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *					<b>x</b>
xiii) The current certification process for members of the profession is adequate. *			<b>x</b>		
xiv) The current supervision and oversight procedures and processes are sufficient. *			<b>x</b>		
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *					<b>x</b>

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

The profession of Sonography requires specialized education and skills to view, analyze and to modify the scan to optimize the information in the image. Because of the high levels of decisional latitude and diagnostic input, Sonographers have a high degree of input in the diagnostic process. A Sonographer must have an educational background strong in anatomy, physiology, pathology and physics to make the proper diagnostic judgment between normal and abnormal states. For the most part the quality of an Ultrasound performed is limited to the knowledge, skill of the person performing it. Unfortunately, there are many individuals performing Ultrasound on patients out there that do not have sufficient skills and knowledge. And as Ultrasound currently remains unregulated Patients and public remain will continue to be at risk. I am a practicing Sonographer, educator and very knowledgeable of Medical Imaging particularly in the field of Ultrasound and I have seen the effects of non regulation. Throughout my career I have seen many examples of patients being misdiagnosed because they had their Ultrasound performed by an inexperienced, unqualified Sonographer. Regulation under a college would have helped to prevent this as the college would be able to ensure that only properly trained credential individuals could perform ultrasound. As it currently stands anyone can perform Ultrasound. Regulation would ensure that minimal standards are, protecting the public, enhancing health care and saving costs.

# The Hospital for Sick Children

## Submission 3

### Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Last Name

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health services organization

Organization name (optional)

1)Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

»Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
- ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 3
- iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 0
- iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
- v) Sufficient evidence was presented regarding risk of harm. 0
- vi) Regulation is required due to the vulnerability of the patient population. 0
- vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
- viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 1
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 2
- x) Other 0

Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
- ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
- iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
- iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
- v) Insufficient evidence was presented regarding risk of harm.
- vi) The professions' patient population does not require special protection.
- vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
- viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
- x) Other

Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *	<b>x</b>				
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *			<b>x</b>		
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *				<b>x</b>	
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *		<b>x</b>			
v) Sufficient evidence was presented regarding risk of harm. *		<b>x</b>			
vi) Regulation is required due to the vulnerability of the patient population. *		<b>x</b>			
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *			<b>x</b>		
viii) Regulation is required because the practice of the profession involves the				<b>x</b>	



xvi) Other

Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *			<b>x</b>		
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *			<b>x</b>		
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *			<b>x</b>		
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *			<b>x</b>		
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *			<b>x</b>		
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *			<b>x</b>		
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *			<b>x</b>		
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *					<b>x</b>
ix) Regulation of the profession will enhance access to safe, high-quality care. *				<b>x</b>	
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *			<b>x</b>		
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *			<b>x</b>		
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *			<b>x</b>		
xiii) The current certification process for members of the profession is adequate. *			<b>x</b>		
xiv) The current supervision and oversight procedures and processes are sufficient. *					<b>x</b>
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *			<b>x</b>		

# Mohawk College

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Last Name

Phone (optional)

Email address (optional)

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Educational institution

Organization name (optional)

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 1
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 0
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
  - viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 2
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 3
  - x) Other 0
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
  - ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
  - iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
  - iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
  - v) Insufficient evidence was presented regarding risk of harm.
  - vi) The professions' patient population does not require special protection.
  - vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
  - viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
  - x) Other
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *				x	
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *		x			
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					x
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *			x		

x

v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *				<b>x</b>	
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *			<b>x</b>		
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *					<b>x</b>
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *					<b>x</b>

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- |  |   |
|--|---|
| i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care.  | 1 |
| ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.  | 0 |
| iii) The profession's practice is supported by a distinct body of evidence-based knowledge.  | 0 |
| iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation.  | 0 |
| v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession.   | 0 |
| vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA.   | 4 |
| vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions.  | 5 |
| viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers.   | 0 |
| ix) Regulation of the profession will enhance access to safe, high-quality care.   | 2 |
| x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). | 0 |
| xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).   | 0 |
| xii) Sufficient evidence was presented regarding the appropriateness of regulation.  | 3 |
| xiii) The current certification process for members of the profession is inadequate.   | 0 |
| xiv) The current supervision and oversight procedures and processes are insufficient.  | 0 |
| xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities.         | 0 |
| xvi) Other   | 0 |

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- |  |  |
|--|--|
| i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.   |  |
| ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.  |  |
| iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.  |  |
| iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.  |  |
| v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.   |  |
| vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.                                   |  |
| vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.  |  |
| viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.   |  |
| ix) Regulation of the profession will not enhance access to safe, high-quality care.   |  |
| x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times). |  |
| xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).   |  |

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
  - xiii) The current certification process for members of the profession is adequate.
  - xiv) The current supervision and oversight procedures and processes are sufficient.
  - xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *			<b>x</b>		
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *				<b>x</b>	
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *				<b>x</b>	
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *				<b>x</b>	
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *				<b>x</b>	
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *			<b>x</b>		
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *				<b>x</b>	
xiii) The current certification process for members of the profession is adequate. *		<b>x</b>			
xiv) The current supervision and oversight procedures and processes are sufficient. *		<b>x</b>			
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *				<b>x</b>	

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

Mohawk has been involved in high-quality education and training for the field of Ultrasonography for over 25 years and has been a strong advocate of including Ultrasonography under RHPA.

The OAMRS has presented a solid case and sufficient evidence to support regulation of this profession.

There is a significant risk of the wrong diagnosis or missed diagnosis due to the subjective nature of the examination.

Regulation will ensure a minimum level of education, training and competency which will serve Ontarians very well.

# North York General Hospital

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

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My name is (optional)

First Name

Last Name

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Primary occupational type (choose one) \*

»Regulated health professional

Type of employer/organization \*

»Health services organization

Organization name (optional)

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

» Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
- ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
- iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 0
- iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
- v) Sufficient evidence was presented regarding risk of harm. 0
- vi) Regulation is required due to the vulnerability of the patient population. 2
- vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
- viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 1
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 3
- x) Other 0

Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
- ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
- iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
- iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
- v) Insufficient evidence was presented regarding risk of harm.
- vi) The professions' patient population does not require special protection.
- vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
- viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
- x) Other

Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *				<b>x</b>	
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *		<b>x</b>			
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *				<b>x</b>	
v) Sufficient evidence was presented regarding risk of harm. *				<b>x</b>	



- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
  - xiii) The current certification process for members of the profession is adequate.
  - xiv) The current supervision and oversight procedures and processes are sufficient.
  - xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *				<b>x</b>	
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *					<b>x</b>
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *					<b>x</b>
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *				<b>x</b>	
xiii) The current certification process for members of the profession is adequate. *				<b>x</b>	
xiv) The current supervision and oversight procedures and processes are sufficient. *		<b>x</b>			
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *			<b>x</b>		

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

Thank you for the opportunity for our organization to express our support of the OAMRS' submission to the HPRAC to regulated Diagnostic Medical Sonographers under the Regulated Health Professions Act.

In addition to our survey responses, we suggest our support and if the HPRAC approves the application from the OAMRS to regulated diagnostic Sonographers under the RHPA there must be:

1. A specified time frame and process for transition to certify regulated healthcare professionals who use diagnostic ultrasound as part of their practice must be established.
2. Education of all regulated healthcare professionals who use diagnostic ultrasound as part of their practice must receive education through a recognized educational institution prior to writing their certification examination for a specific imaging specialty (i.e., ARDMS' Breast Imaging for Mammographers exam or ARDMS' Obstetrics & Gynecology Practice exam).
3. Consideration must be made for regulated healthcare professionals who have already successfully completed their education in their ultrasound imaging specialty, have been practicing this knowledge skill and judgement to image patients and continue to be under sufficient, direct supervision of

a physician to continue practicing with specific conditions in place.

4. Ultrasound examinations performed outside of a Medical Imaging Department need to have specific scanning protocols indicating the required imaging to be acquired and have processes in place for the archival of these acquired images.

5. An ongoing quality audit process must be in place to review imaging examination(s) for compliance of the imaging protocols.

# Ontario Society of Cardiology Technologists

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

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To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Irene

Last Name

Williamson

Phone (optional)

519-542-9327

Email address (optional)

iwilli@cogeco.ca

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Unregulated health professional association

Organization name (optional)

Ontario Society of Cardiology Technologists (OSCT)

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 2
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 1
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 3
  - vi) Regulation is required due to the vulnerability of the patient population. 0
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
  - viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 0
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
  - x) Other 0
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
  - ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
  - iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
  - iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
  - v) Insufficient evidence was presented regarding risk of harm.
  - vi) The professions' patient population does not require special protection.
  - vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
  - viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
  - x) Other
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *					<b>x</b>
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *				<b>x</b>	

v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *				<b>x</b>	
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *					<b>x</b>

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. 4
- ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. 5
- iii) The profession's practice is supported by a distinct body of evidence-based knowledge. 0
- iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 0
- v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. 0
- vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 2
- vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 0
- viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
- ix) Regulation of the profession will enhance access to safe, high-quality care. 0
- x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). 0
- xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). 1
- xii) Sufficient evidence was presented regarding the appropriateness of regulation. 0
- xiii) The current certification process for members of the profession is inadequate. 0
- xiv) The current supervision and oversight procedures and processes are insufficient. 3
- xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities. 0
- xvi) Other 0

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
- ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.
- iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
- iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
- v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
- vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
- vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
- viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
- ix) Regulation of the profession will not enhance access to safe, high-quality care.
- x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
- xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).

- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
- xiii) The current certification process for members of the profession is adequate.
- xiv) The current supervision and oversight procedures and processes are sufficient.
- xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
- xvi) Other

Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *					<b>x</b>
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *				<b>x</b>	
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *			<b>x</b>		
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *				<b>x</b>	
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *			<b>x</b>		
ix) Regulation of the profession will enhance access to safe, high-quality care. *				<b>x</b>	
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *					<b>x</b>
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *					<b>x</b>
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *					<b>x</b>
xiii) The current certification process for members of the profession is adequate. *				<b>x</b>	
xiv) The current supervision and oversight procedures and processes are sufficient. *	<b>x</b>				
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *			<b>x</b>		

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

As stakeholders and as allied health professionals, the Ontario Society of Cardiology Technologists (OSCT) is pleased to submit our survey. We endorse and offer our strong support for approval of the Diagnostic Sonography submission.

Many OSCT members carry dual certification as Registered Cardiology Technologists and Diagnostic Cardiac Sonographers. In health care settings our distinct disciplines collaborate interprofessionally from coordinating patient appointments for cardiac diagnostic tests to performance of diagnostic tests such as stress echo.

A regulated health professional is best equipped to ensure the protection and promotion of quality and efficient health care.

# Provincial Council for Maternal and Child Health

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

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For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Beverly

Last Name

Guttman

Phone (optional)

416-813-6793

Email address (optional)

beverly.guttman@pcmch.on.ca

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Health sector interest group/association

Organization name (optional)

Provincial Council for Maternal and Child Health

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?  
 » Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*  
 » Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 1
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 2
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 3
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 0
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
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4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *	<b>x</b>				
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iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *					<b>x</b>

v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *			<b>x</b>		
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- iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 0
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- vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 5
- vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 0
- viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
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7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
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vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
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viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *					<b>x</b>
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x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
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xiv) The current supervision and oversight procedures and processes are sufficient. *	<b>x</b>				
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8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

Please see attached document from the Provincial Council for Maternal and Child Health in support of Sonographer regulation.

# Sonography Canada

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

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To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

My name is (optional)

First Name

Tom

Last Name

Hayward

Phone (optional)

1-888-273-6746

Email address (optional)

thayward@sonographycanada.ca

Geographical location (optional)

»Ontario

Contact Information

I am responding \*

»On behalf of an organization

Type of employer/organization \*

»Unregulated health professional association

Organization name (optional)

1) Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

» Yes

2) Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

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- iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 2
- iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
- v) Sufficient evidence was presented regarding risk of harm. 3
- vi) Regulation is required due to the vulnerability of the patient population. 0
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- x) Other 0

Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
- ii) The current oversight structure, including direct and indirect supervision, is sufficient in protecting the public from risk of harm.
- iii) The profession does not make decisions or judgments that can have a significant impact on patients' physical or mental health.
- iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
- v) Insufficient evidence was presented regarding risk of harm.
- vi) The professions' patient population does not require special protection.
- vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
- viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
- ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
- x) Other

Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *					<b>x</b>
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *		<b>x</b>			
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *					<b>x</b>

iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *					<b>x</b>
v) Sufficient evidence was presented regarding risk of harm. *					<b>x</b>
vi) Regulation is required due to the vulnerability of the patient population. *					<b>x</b>
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *			<b>x</b>		
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *				<b>x</b>	
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

» Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- |  |   |
|--|---|
| i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care.  | 4 |
| ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.  | 1 |
| iii) The profession's practice is supported by a distinct body of evidence-based knowledge.  | 0 |
| iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation.  | 0 |
| v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession.   | 0 |
| vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA.   | 2 |
| vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions.  | 3 |
| viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers.   | 0 |
| ix) Regulation of the profession will enhance access to safe, high-quality care.   | 0 |
| x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). | 0 |
| xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).   | 0 |
| xii) Sufficient evidence was presented regarding the appropriateness of regulation.  | 5 |
| xiii) The current certification process for members of the profession is inadequate.   | 0 |
| xiv) The current supervision and oversight procedures and processes are insufficient.  | 0 |
| xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities.         | 0 |
| xvi) Other   | 0 |

Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*

- |  |  |
|--|--|
| i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.   |  |
| ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.          |  |
| iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.  |  |
| iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.  |  |
| v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.   |  |
| vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA. |  |
| vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.  |  |
| viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.   |  |
| ix) Regulation of the profession will not enhance access to safe, high-quality care.   |  |

- x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
- xi) Regulation will not improve patients' health outcomes (i.e., clinical, psychosocial or quality of life).
- xii) Insufficient evidence was presented regarding the appropriateness of regulation.
- xiii) The current certification process for members of the profession is adequate.
- xiv) The current supervision and oversight procedures and processes are sufficient.
- xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
- xvi) Other

Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *					<b>x</b>
ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. *					<b>x</b>
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *					<b>x</b>
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *					<b>x</b>
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *			<b>x</b>		
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *					<b>x</b>
xiii) The current certification process for members of the profession is adequate. *					<b>x</b>
xiv) The current supervision and oversight procedures and processes are sufficient. *		<b>x</b>			
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *			<b>x</b>		

8) General comments can be provided in the space below. Alternatively, comments can be submitted directly to the HPRAC office. See website for details.

Sonography Canada is the national certification body for Canadian sonographers and supports the sonography profession at the national level with respect to its professional code of conduct, continuing education, best practices and public advocacy.

We strongly support and endorse the Ontario Association of Medical Radiation Sciences (OAMRS) submission for self-regulation of Ontario sonographers.

Sonography Canada's objectives are very much aligned with the objectives of the Ontario Regulated Health Professions Act, 1991, in particular as they relate to protecting the public from harm and from unqualified, incompetent or unfit providers and to promoting safe & quality patient centered care. Sonography Canada, in conjunction with the Canadian Medical Association (CMA) and 12 CMA accredited education institutions across Canada (6 of which are located in Ontario) have created a world class, competency based approach to educating and credentialing Canadian sonographers. It concerns us greatly that there are no regulations requiring sonographers to be adequately educated and certified in Ontario, and for that matter, in any jurisdiction in Canada, although we are very much encouraged by the legislation in Nova Scotia that we understand will be implemented later this year.

jurisdiction in Canada, although we are very much encouraged by the legislation in Nova Scotia that we understand will be implemented later this year. As OAMRS has demonstrated in their submission, in the absence of regulation there is a very real potential for unqualified providers to cause patient harm.

As of January 1, 2014, the Canadian Society of Diagnostic Medical Sonographers (CSDMS) and the Canadian Association of Registered Diagnostic Medical Sonographers (CARDUP) amalgamated into a single organization under the name Sonography Canada. One of the drivers for this was our current belief and long-term vision that sonography should become regulated in all Canadian jurisdiction. By combining responsibility for national competency profiles and national credentialing examinations with professional conduct, continuing medical education and professional liability insurance programs we have in place a cohesive national framework with which to support provincial self-regulation and to enable labour mobility across regulated jurisdictions through national credentialing standards.

# Unregulated Health Professional Association

## Purpose of the Survey

The Minister of Health and Long-Term Care, the Hon. Deb. Matthews, has asked the Health Professions Regulatory Advisory Council (HPRAC) to provide advice on the currency of a previous recommendation to regulate diagnostic sonographers, understanding the importance of broad public consultation with key groups and stakeholders within the diagnostic sonography community who may not have been included in HPRAC's original review.

Many organizations and individuals have extensive experience and interest in health care, health professions regulation, and the public interest. HPRAC wants to ensure that this experience and interest are fully reflected in its recommendation-making process. Therefore, HPRAC invites comments on the proposal submitted by the Ontario Association of Medical Radiation Sciences (OAMRS) for the regulation of diagnostic sonographers under the Regulated Health Professions Act, 1991 (RHPA).

Stakeholder feedback will be publicly posted according to HPRAC's access to information guidelines. To view the guidelines, please visit this website: <http://www.hprac.org/en/privacy.asp>

To view the RHPA in its entirety, please visit this website: [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_91r18\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_91r18_e.htm)

For details on HPRAC's process for regulating a new health profession under the RHPA, please visit this website: <http://www.hprac.org/en/reports/otherresources.asp>

Geographical location (optional)

»Ontario

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Contact Information

I am responding \*

»On behalf of an organization

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Type of employer/organization \*

»Unregulated health professional association

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1)Has the OAMRS demonstrated convincingly that it is in the public interest that diagnostic sonographers be regulated under the RHPA?

»Yes

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2)Has the OAMRS demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA? \*

»Yes

---

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements, assigning numbers 1-3 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated with evidence that diagnostic sonographers pose a risk of harm to the health and safety of the public if the profession is not regulated under the RHPA). \*

- i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. 0
  - ii) The current oversight structure, including direct and indirect supervision, does not sufficiently protect the public from risk of harm. 0
  - iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. 1
  - iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. 0
  - v) Sufficient evidence was presented regarding risk of harm. 0
  - vi) Regulation is required due to the vulnerability of the patient population. 3
  - vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. 0
  - viii) Regulation is required because the practice of the profession involves the performance of controlled acts. 2
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. 0
  - x) Other 0
- Rank values must be between 1 and 3

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

3) Rank the top THREE statements (assigning numbers 1-3 in terms of importance, with 1 being most important) that best support your response to the previous question (i.e., that the OAMRS has not demonstrated with evidence that diagnostic sonographers pose a risk of harm if the profession is not regulated under the RHPA). \*

- i) The profession is not involved in activities that have a significant potential to cause physical or mental harm to the public.
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  - iv) The practice environment does not give rise to a significant potential for physical or mental harm to the public.
  - v) Insufficient evidence was presented regarding risk of harm.
  - vi) The professions' patient population does not require special protection.
  - vii) The rate and nature of complaints of harm provides compelling evidence against regulation under the RHPA.
  - viii) For the performance of controlled acts, regulation would not provide a significant, additional protection from risk.
  - ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, provides compelling evidence against regulation under the RHPA.
  - x) Other
- Rank values must be between 1 and 3

4) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) The profession is involved in activities that have a significant potential to cause physical or mental harm to the public. *				<b>x</b>	
ii) The current oversight structure is sufficient in protecting the public from risk of harm. *		<b>x</b>			
iii) The profession is engaged in making decisions or judgments that can have a significant impact on patients' physical or mental health. *				<b>x</b>	
iv) The practice environment gives rise to a significant potential for physical or mental harm to the public. *				<b>x</b>	
v) Sufficient evidence was presented regarding risk of harm. *				<b>x</b>	
vi) Regulation is required due to the vulnerability of the patient population. *				<b>x</b>	
vii) The rate and nature of complaints of harm for this profession are compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	
viii) Regulation is required because the practice of the profession involves the performance of controlled acts. *				<b>x</b>	
ix) Recent changes in the practice of the profession, such as changes in treatment and/or technology, is compelling evidence in favour of regulation under the RHPA. *				<b>x</b>	

5) Has the OAMRS demonstrated convincingly that regulation under the RHPA is appropriate for the profession? \*

»Yes

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

- 6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*
- i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. 0
  - ii) Members of the profession are sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession. 1
  - iii) The profession's practice is supported by a distinct body of evidence-based knowledge. 0
  - iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. 0
  - v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. 0
  - vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. 0
  - vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. 5
  - viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. 0
  - ix) Regulation of the profession will enhance access to safe, high-quality care. 2
  - x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). 0
  - xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). 0
  - xii) Sufficient evidence was presented regarding the appropriateness of regulation. 3
  - xiii) The current certification process for members of the profession is inadequate. 0
  - xiv) The current supervision and oversight procedures and processes are insufficient. 4
  - xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an inadequate process in place to determine their respective roles, relationships, responsibilities and liabilities. 0
  - xvi) Other 0
- Rank values must be between 1 and 5

The following statements describe some of the factors that HPRAC takes into consideration when preparing its recommendation. (Additional comments can be made under Question 8.)

- 6) Rank the top FIVE statements, assigning numbers 1-5 in terms of importance, with 1 being most important, that best support your response to the previous question (i.e., that the OAMRS has not demonstrated convincingly that regulation under the RHPA is appropriate for the profession). \*
- i) Members of the profession do not exercise professional judgement autonomously in the delivery of care, or do so only to a limited extent.
  - ii) Members of the profession are not sufficiently educated to possess the skills and competencies necessary to deliver safe and competent care on entry to the profession.
  - iii) The profession's practice is not supported by a distinct body of evidence-based knowledge.
  - iv) Members of the profession are not able to financially support the ongoing costs and responsibilities of regulation.
  - v) Compared to other regulatory mechanisms, regulation under the RHPA is not the most appropriate way to oversee the profession.
  - vi) The profession's leadership, and members of the profession, have not shown that they are able and committed to support the public interest mandate of regulation under the RHPA.
  - vii) The profession has not shown a willingness and a capacity to effectively collaborate with other professions.
  - viii) With respect to labour mobility, regulation will have a negative impact on the supply and demand of diagnostic sonographers.
  - ix) Regulation of the profession will not enhance access to safe, high-quality care.
  - x) Regulation will have a neutral or negative influence on health human resource productivity (e.g., minimal impact on reducing the burden on emergency rooms; extending physician capacity; and reducing wait times).
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  - xiv) The current supervision and oversight procedures and processes are sufficient.
  - xv) Where diagnostic sonographers work alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities.
  - xvi) Other
- Rank values must be between 1 and 5

7) Indicate your level of agreement with each of the statements below. Base your response on the evidence provided by the applicant.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
i) To a substantial degree, members of the profession exercise professional judgement autonomously in the delivery of care. *				x	
ii) Members of the profession are sufficiently educated to possess the skills				x	

and competencies necessary to deliver safe and competent care on entry to the profession. *					
iii) The profession's practice is supported by a distinct body of evidence-based knowledge. *				<b>x</b>	
iv) Members of the profession are able to financially support the ongoing costs and responsibilities of regulation. *				<b>x</b>	
v) Compared to other regulatory mechanisms, regulation under the RHPA is the most appropriate way to oversee the profession. *					<b>x</b>
vi) The profession's leadership, and members of the profession, have shown that they are able and committed to support the public interest mandate of regulation under the RHPA. *					<b>x</b>
vii) The profession has shown a willingness and a capacity to effectively collaborate with other professions. *				<b>x</b>	
viii) With respect to labour mobility, regulation will have a positive impact on the supply and demand of diagnostic sonographers. *				<b>x</b>	
ix) Regulation of the profession will enhance access to safe, high-quality care. *					<b>x</b>
x) Regulation will have a positive influence on health human resource productivity (e.g., efficiencies will be created, such as reducing the burden on emergency rooms, extending physician capacity and reducing wait times). *				<b>x</b>	
xi) Regulation will improve patients' health outcomes (i.e., clinical, psychosocial or quality of life). *				<b>x</b>	
xii) Sufficient evidence was presented regarding the appropriateness of regulation. *				<b>x</b>	
xiii) The current certification process for members of the profession is adequate. *			<b>x</b>		
xiv) The current supervision and oversight procedures and processes are sufficient. *			<b>x</b>		
xv) Where diagnostic sonographers provide care alongside regulated health professionals, there is an adequate process in place to determine their respective roles, relationships, responsibilities and liabilities. *				<b>x</b>	

**Table 1: Responses from Individuals to Question 8**

**Table 1**

<b>Question 8: Do you have any other general comments?</b>
<b>Submitter 1</b> <p>Sonography is a very practical-based profession that requires intensive clinical training. Currently, anyone can write and pass the written online certification exams and call themselves sonographers. The general public is placed at risk by these inexperienced workers.</p> <p>Because sonography receives government funding for all procedures performed, and because many private clinics take advantage of this fact, an inexperienced 'sonographer' is hired at a very cheap rate. Having not been properly trained to perform the procedures, these 'sonographers' are only taught to put through excessive numbers of patients in order that the owners can capitalize on the government funding of all ultrasound tests. Many owners of these private clinics are not even radiologists and their only interest is the bottom line. Therefore these ultrasound studies are inadequate and put the general population at risk.</p> <p>Sonography needs to be regulated now! Let us protect the public that includes all your family members and mine!</p>
<b>Submitter 2</b> <p>I am a sonographer and radiographer and as a profession we have been requesting for regulations to protect the general public for at least 20 years, hopefully this will happen this time.</p>
<b>Submitter 3</b> <p>This professional organization needs to be regulated to avoid abuse of our skills and harm to the public. We need to make sure that we always put the quality of patient care first.</p> <p>Please help us regulate this profession.</p>
<b>Submitter 4</b> <p>The self regulation of sonographers by RHPA, will be a welcome change in Ontario health care landscape.</p> <p>As the manager of a cardiac &amp; pulmonary diagnostic testing facility the importance of highly knowledgeable and skilled sonographers is a key element to providing quality testing to our patients.</p> <p>While our facility recognizes the value of sonographers, it is not uncommon that patients complain to us of other facilities that do not hold these qualities in as high a regard. It is our hope that the regulation of sonographers, along with the accreditation of laboratories providing echocardiography will aid in resolving this concern for our patients.</p> <p>Thank you to HPRAC for re-addressing the regulation of sonographers in Ontario.</p>
<b>Submitter 5</b> <p>Of all of the imaging modalities, sonography requires the greatest level of autonomous decision-making. It is not just selecting appropriate equipment settings that determine the success of the examination but the minute to minute movements of the ultrasound transducer and the recognition of disease processes that can determine positive patient outcomes. In sonography, you are not placing a patient in a machine; the sonographer is the machine. The intimacy of Ultrasound examinations requiring skin contact places</p>

patients in a vulnerable position. Properly trained and regulated sonographers who understand the consequences of operating below the community standard will help ensure the best care for Ontario patients.

Regulation is long-overdue for Sonography.

**Submitter 6**

Because ultrasound is an operator dependent exam. The one who manipulates the probe is the one who guides the diagnosis. If it is not possible for the ultrasound to be done by a physician, so, I recommend it is done by a new regulated group of sonographers 'Ultrasound Practitioners' who could be evaluated according to following;

- 1- Examining room should be the only place where sonographers go to be evaluated for the regulatory group.
- 2- Medical Council of Canada Evaluating Exam (MCCEE) could be satisfactory for the medical part of the evaluation.
- 3- CARDUP could complete the ultrasound technical part.
- 3- References, recommendation letters and interviews are not as good as the examining room. They may lead to favoritism simply because every one has a bias and no one is perfect.

**Submitter 7**

Sonographers/echocardiographers directly impact the accuracy and sensitivity of diagnosis when performing a sonographic examination. Sonographers work closely with their physician colleagues - and in future their role may well increase in accountability. The profession in the UK has advanced practice where sonographers are certified to provide independent consultation/reports following the completion of the study.

**Submitter 8**

I am a member of the ACMDTT of Alberta and CAMRT.

That choice was not available when selecting member of regulated body as the answers were for Ontario

We in Alberta are trying to become regulated as well

**Submitter 9**

Regulation should eliminate untrained or inadequately trained sonographers from writing the exam and practicing with adequate clinical training. Most that are trained through the schools in Ontario are very professional and good practicing technologists but there are a few that are getting into the system that are not adequately trained. One of the reasons that I am in favor of regulation.

**Submitter 10**

My concern is the cost of regulation in terms of dollars and registrar demands. I am also a Registered Respiratory Therapist who has experienced turmoil within our college related to Registrar demands and cost of regulation.

**Submitter 11**

currently there are technologists practicing who have not had any formal training at approved schools.

ie foreign trained doctors

It is hoped that regulation will prevent this in the future

**Submitter 12**

It is a danger to the public to have unregistered, unregulated sonographers working within our province/country. The skills required to perform ultrasound studies for diagnostic examinations are under-rated in the current system and it is the public's best interest to change this.

**Submitter 13**

I believe it would be irresponsible not to regulate diagnostic medical sonography. The public deserves protection from the potential risk of harm if an under qualified or under trained sonographer were to overlook a disease process. There are not sufficient measures currently in place to make sure that this isn't happening. In fact I'm sure that it is happening (misdiagnosis or non diagnosis of pathology due to sonographer error).

**Submitter 14**

Regulation of the Sonographer should include a clinical component. Certification via successful exam completion ARDMS/CARDUP doesn't always equate to competency in a clinical setting.

Regulation is important since Sonographers perform intimate internal exams such as transvaginal or transrectal sonography.

Regulation is necessary to support controlled acts.

**Submitter 15**

There are many roles that sonographers perform that go over and above what other regulated professions do. Their judgement and knowledge is key in diagnosing patients which is directly related to patient care. I believe that becoming regulated will help in ensuring that patient care is the best it can be.

**Submitter 16**

As a trained Sonographer, Medical Radiation Technologist and Charge Technologist for a large Diagnostic Imaging Unit I feel very strongly that Sonography should be Regulated. I have more training than an MRT-having attended and extra post graduate year to train in Sonography. The Sonographers are generally paid at a higher rate than an MRT as they have more responsibility and often more training than most MRT's.

The Sonographer is much more responsible for the imaging results than any other type of Technologist in the Diagnostic Team. We are scanning in 'Real-time' through the body and what we see and our impression are what the Reporting Physician reports on. Without the knowledge, skills and judgement to perform the examination - the Sonographer can make abnormalities appear normal and conversely make normal examinations appear abnormal. We need strong critical thinking skills and a high level of competence in anatomy and physiology in order to understand the image and give an accurate impression of the findings.

In high risk obstetrics people are making life and death decisions based on our findings. If I miss the abnormality - the families may be impacted for life. Breast imaging is more complex, with breast ultrasound becoming a specialization onto itself. Only highly trained professionals with the knowledge skills and judgement should be scanning. The public is very surprised when they find out that we are not regulated. You must be very careful of where you are scanned and who is doing the scan as not all scans are 'equal'.

When I post a job for a Sonographer, I will often have more responses to the posting from people who have not be formally trained to scan, they often come from other countries where skills are well below the Canadian standard and cannot perform the examinations competantly in many cases. The public needs to be protected and there is a definite need to ensure that there are standards in place, including a College. I generally hire only graduates of accedited programs as I know I am getting the 'real deal'.

The Profession does need to be Regulated to protect the public. We are a very integral part of the Diagnostic Imaging team and the potential for risk of harm is very real.

**Submitter 17**

Regulation is long overdue.

**Submitter 18**

Good survey.

**Submitter 19**

Ultrasound done in ER. by untrained physician are often leading to wrong diagnosis and wrong treatment. Creating stress on the patient and harming them.

Same apply with the 3D clinics in Ontario. Those little fetus are exposed to long period of unnecessary ultrasound, non knowing the harmful effects on them.

**Submitter 20**

Unfortunately anyone can pick up a probe and operate sonography equipment. even tom cruise. stop letting this be a mockery in the medical profession having scanned a pt with a single fetus that was scanned at a clinic who was told she had twins by the technologist, being in a clinic that has the probe cleaning material on the floor encrusted with dried chemical, and many more stories that sicken and blacken the real professionals who are dedicated to providing exceptional care.

**Submitter 21**

Sonographers that are credentialled do have the knowledge and skills to provide high quality care...but the problem lies in the fact that you don't have to credentialled to be employed. Regulation would prevent non credentialled and non skilled sonographers from being employed and also a liability.

**Submitter 22**

Ultrasonographers have a huge body of knowledge, that they use in performing ultrasound exams. This is quite often done without a radiologist present, in rural areas, and the report is very reliant on the expertise of the technologist.

**Submitter 23**

I do not support regulation, primarily because the application of sound has a minimal biohazard risk to patients.

Sonographers provide patient care activities that are equal or less than other allied health professions.

While sonographers can mis-identify pathologies in a patient, this will not necessarily go away with regulation - sonographers will always make mistakes. As well, they are supervised by radiologists, cardiologists, and obstetricians who are responsible for the reporting of the case. These physicians must use their professional judgment when

supervising a sonographer.

I believe the issue at hand is the fact that some physicians/employers are employing sonographers who have not gone through the Canadian registry process. If a sonographer has graduated from an accredited program and has successfully achieved registration with CARDUP; they are a competent sonographer and they are required to participate in continuing competency. If hospitals and IHFs were required to hire only CARDUP certified sonographers as part of their licenses, this issue would disappear. Right now, most hospitals/IHFs have not replaced the former ARDMS requirements with CARDUP requirements.

**Submitter 24**

The Public interest is served when professions that they respect and Trust are regulated under the umbrella of the RHPA (1991) because of the components of the legislation that includes complaints, discipline, quality assurance in the Code as well as the objects and organizational requirements in Schedule 1.

**Submitter 25**

I have been an ultrasonographer since 1978. I have seen many bad technologists, most of whom were doctors in foreign countries who cannot practice medicine here so go into this profession. They have the book learning to pass the written examination, so become registered technologists, but do not have the hands on experience to actually make a scan. It is akin to passing the written driving test, but never having actually driven a car. Some years ago, I wrote to the American Registry of Diagnostic Medical Sonographers (ARDMS) about this phenomenon asking how they were allowed to write the exams, when at the time I wrote mine, I had to provide a letter from a radiologist confirming that I had the hands on skill to perform the examinations that I wanted to be registered in. The return answer was that the doctors are allowed to pass judgement on themselves and write their own letters of reference.

A regulatory body would insist on a more adequate reference.

**Submitter 26**

I have been a registered diagnostic sonographer for over 30 years. I have seen many changes in that time. Our duties as sonographers has evolved over the years. As a group we have been trying to become regulated for at least 25 years. With the type of examinations we now perform, it is more important than ever to have regulation. The patients need to be protected but so does our profession. Patients deserve to be examined by a qualified and well trained sonographer no matter where the scan is done. I am only 4 years from retirement and I hope to see regulation become reality before my career is finished.

**Submitter 27**

I have been a Sonographer for more than 20 years. Technology and examinations have changed significantly over the years. In my opinion, it is imperative that we become regulated to protect the public from having their ultrasound exams performed by people who are not as educated or experienced as they should be. We make many decisions throughout each examination that could potentially cause harm to our patients if we are careless, uneducated, inexperienced, or unsupervised. This harm could be from not obtaining appropriate patient history, missing pathology, misinterpreting images, not documenting properly, not cleaning properly, etc,...

Ultrasound is an amazing field to be in, but one must be aware of the danger that can

occur if one is not careful and educated appropriately. The public must be protected. The public is our family.

**Submitter 28**

My primary concern is that without regulation, the safety of the public is compromised as sonographers are not currently obligated to adhere to a standardized scope of practice, competencies and continuing education.

**Submitter 29**

Ultrasound is the most operator dependent imaging modality yet there are many people working today with very little scanning ability which leads to wrong and missed diagnosis

**Submitter 30**

The degree of skill and knowledge is vastly different among sonographers in Ontario. From my experience, this is directly related to how the person was trained and where they achieved their certification/registration (American theory based exams vs Canadian competency based exams vs on the job only). The variability and inconsistency in the abilities of sonographers can drastically alter a patient's path as the pathology cannot be diagnosed if the sonographer does not image it. A radiologist (the reporting doctor) has absolutely NO way of knowing that a sonographer has missed and not imaged an important finding. This is due to the nature of the sonographer and radiologist relationship and process, and a trust and knowledge that the sonographer is competent is vital to a good patient outcome. That is why it is so important that sonographers be regulated and it become mandatory for all sonographers to follow the same rigorous training that is offered in the Canadian Exams by CARDUP and be upheld to high standards.

**Submitter 31**

Educational programs vary greatly - there are outstanding programs (CMA accredited advanced diploma and degree) and sub-standard programs (non-accredited short term programs).

The current certification process is adequate, BUT is not mandatory or required.

If the sonographer:

- . does not identify pathology and record images, it will likely not be diagnosed.
- . erroneously identifies pathology, that may be the diagnosis

Sonographers perform intimate diagnostic examinations (trans vaginal, trans rectal, breast, testes) - the public needs to have properly trained and credentialled professionals performing these studies.

**Submitter 32**

Regulating ultrasound would be in the best interest for the health of Ontarians.

**Submitter 33**

A radiologist can only diagnose what is shown in the images provided by the sonographer.

Ultrasound works the same way. The radiologists and referring practitioners must rely on the education, skill and experience of the sonographer to scan carefully, to find and show both normal and abnormal parts of the anatomy. If the sonographer does not notice an abnormality, there is almost a zero chance that it will happen to be in an image and picked up by the reporting radiologist. It would be like the mugging happening to be in the background of someone's vacation photos!

The idea that we 'just take the pictures' and the radiologist 'makes the diagnosis' is simply NOT the reality. We have to recognize the exact plane that demonstrates an abnormality, save appropriate images, and even describe our observations to the reporting radiologist.

The idea that we could just record the entire scan on video is also not realistic because there is certainly not time for our radiologists to watch all that video. If they tried, they would fast forward through and miss some of the pathology that we see--- because that is OUR job, our training, our specialty and what we do for eight busy hours each workday.

Sonographers who have proper Canadian College/University program training are proud, highly-trained, passionate members of the healthcare team!

I would LOVE to help demonstrate or explain this issue to anyone who needs to understand the importance of making sonography a regulated profession (as the public presume we already are)!

Thank you for reading!

**Submitter 34**

Regulating ultrasound as a profession will not benefit the ultrasonographer in any major way. The negative aspect to regulation will be the increased cost to remain practicing as an ultrasonographer. Education and examination protocols currently in place ensure adequate training and knowledge. A technologist works to provide a technical impression to a radiologist who oversees our work/images to provide a medical diagnosis. It is the radiologist who will also determines if our work is adequate/appropriate and it is their responsibility to provide a medical diagnosis not the technologist. An ultrasonographer does not preform any act that places a patient in any direct harm or potential for harm.

**Submitter 35**

As a member of the public after reviewing the submission I believe that the public is at risk with the current oversight of of sonographers. Practitioners that lack The knowledge skill and judgement can significantly harm patients especially with the performance of controlled acts. Poorly trained practitioners can miss pathology or create pathology which may lead to additional invasive testing. All the other imaging professions are regulated so it makes no sense not to have sonographers included in the College with the other imagers.

**Submitter 36**

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**Submitter 37**

Given the nature of the several invasive sonographic procedures (e.g. transvaginal, transrectal) ultrasound combined with the burden on sonographers to provide a

preliminary diagnostic impression, there could potentially be a significant negative impact on patient care / clinical outcomes when sonographers that have not been appropriately trained are performing these examinations. Patient safety must always be at the forefront and regulation of the profession is long overdue. Regulation of the profession will also ensure that educational requirements for sonographers will be standardized across the province as those who wish to practise sonography will need to be graduates of accredited sonographer programs and successfully pass provincially-approved certification examinations. Regulation of the profession will also benefit sonographers as well in terms of ensuring that they carry PLI which is mandatory or becoming mandatory for all regulated health professions.

**Submitter 38**

I believe that by regulating this profession, the patient's demographic and medical confidential info will be more protected.

At the moment, sonographers working in a hospital environment are trained by the hospital on how do not disclose patients' confidential info, however having this profession regulated will add an additional secure step for protecting patient's confidential info.

**Submitter 39**

My wife and I are now retired seniors. As we age, we find that we need more medical care. Both of us has had to have ultrasound procedures several times. we cannot understand why the profession has not been regulated to this point given the potential risk of harm with practitioners that lack the appropriate training. As a member of the public you assume that the individual preforming your examination is properly trained and educated. It is extremely worrisome that this is not true. We believe that the profession should be regulated to protect the public from harm.

**Submitter 40**

I have had several ultrasound procedures. It is important that the individuals preforming the examinations are competent. Invasive procedures such as trans-vaginal ultrasounds should not be preformed by individuals that lack the appropriate skills. The possible risk of harm presented in the possible errors of performance and interpretation of scans and data is compelling. Given how may individuals have ultrasound examinations completed there is significant potential for risk of harm. I believe that the profession should be regulated.

**Submitter 41**

Regulation is long overdue. I have been a sonographer for over 20 years and have worked with many sonographers in different clinical settings. I am appalled by some sonographers that have credentials and have come by them in not such a legitimate means. I have witnessed scanning that is non diagnostic and not beneficial to the patient only to be repeated elsewhere. This causes stress on the patient and added health care costs to the system. I am disappointed that some places of employment will hire unregistered technologists to save costs. Many of these things happen all the time and regulation may be a way to prevent some of these things from happening.

**Submitter 42**

Making ultrasound a regulated profession would be a great step.

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