The principal purpose of the Health Practitioners Competence Assurance Act 2003 is to protect the health and safety of members of the public by providing for mechanisms to ensure health practitioners are competent and fit to practise their professions.

Consultation: Review of the Scopes of Practice for the Medical Laboratory Science Profession

December 2014
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Could an overseas-trained nurse with 10-years clinical experience (excluding NZ) register as a Specimen Technician (general)?

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Can a registered Medical Laboratory Technician practise as a Specimen Technician?

Can a registered Specimen Technician practise as a Medical Laboratory Technician?

Pulling it all Together

Glossary
A broad overview of the Council’s proposal is presented at the beginning of the document. This is followed by more detail including the practical implications of the proposed changes.

We ask that you provide your feedback by answering a number of questions through an online questionnaire (details on how to access that are provided at the end of this document).

The Medical Sciences Council is reviewing the scopes of practice for the medical laboratory science profession and is seeking feedback from all interested stakeholders

A little bit of background

In 2013 the Medical Sciences Council (the Council) issued an initial consultation document outlining a number of proposals in respect of the scopes of practice defined for the profession of medical laboratory science.

A total of 561 responses were received with strong support for a separate scope of practice for phlebotomists and the addition of specimen services. However a number of issues were highlighted, including concern that the inclusion of new scopes of practice could potentially result in a lack of flexibility. In addition, there was a lack of clarity around the proposed new categories of registration and the practical implications for the introduction of the separation of and/or additional scopes of practice.

To help clarify its thinking on the issues raised, the Council invited industry representatives to a discussion forum in May of this year. In light of that feedback and the feedback from the original consultation document the Council is pleased to re-present its proposals in respect of the scopes of practice for registration in the medical laboratory science profession under the Health Practitioners Competence Act 2003.
A Nutshell View of the Proposed Changes

Currently the Council has defined **two** scopes of practice for medical laboratory science:

1. Medical Laboratory Scientist
2. Medical Laboratory Technician

Within the changes proposed there will be **six** separate scopes of practice:

1. Medical Laboratory Scientist (Provisional)
2. Medical Laboratory Scientist (General)
3. Medical Laboratory Technician (Provisional)
4. Medical Laboratory Technician (General)
5. Specimen Technician (Provisional)
6. Specimen Technician (General)
Summary of the Proposed Changes

- Introduce provisional registration
- Create the term “general registration”
- Create a separate scope of practice of “Specimen Technician” (including phlebotomy, donor technology and specimen services)
- Provide better descriptions of each scope

Introduce provisional registration.

Provisional registration is intended to be an intermediary step that leads onto general (full) registration in the specific scope of practice. Provisional registration will apply for a finite specified period (from 3 months to 2 years).

The purpose of provisional registration is to ensure that practitioners entering the medical laboratory science profession have appropriate monitoring and supervision in place sufficient to protect the health and safety of the public while they gain the necessary New Zealand work-based knowledge and experience to be able to practise without supervision.

Provisional registration is offered to applicants who have been deemed by the Council to hold an appropriate base qualification that meets the required academic standard and require more clinical experience to fully meet the requirements of General Registration.
Create the term “general registration”

The term General Registration is applied to those practitioners who hold a qualification approved by the Council and have the required clinical experience to practise in the specific scope of practice unsupervised. However medical laboratory technicians and specimen technicians are still required to work under the direction of a registered medical laboratory scientist or other registered health practitioner as approved by the Council.

Create a separate scope of practice of Specimen Technician (inclusive of phlebotomy, donor technology and specimen services)

This proposed scope of practice encompasses the medical laboratory science disciplines of phlebotomy, donor technology, and specimen services. While typically categorised as non-analytical, the nature of the work performed within these disciplines is critical to the profession of medical laboratory science and has potential to cause harm to the public.

While the current Medical Laboratory Technician scope of practice includes phlebotomy and donor technology, specimen services have been excluded from the defined parameters of the profession of medical laboratory science. However over the ten years since the implementation of the Health Practitioners Competence Assurance Act, specimen services has been increasingly recognised as a function that is integral to the analytical work performed with the laboratory. Many quality and service aspects of modern laboratories are directly impacted by the work of this group. Modern laboratory equipment is often loaded with samples by specimen services staff effectively integrating this work into the analytical work flow. Council believes this trend will accelerate in the coming years, and the potential risk of harm to the public by this group of practitioners is significant enough to warrant their inclusion within a medical laboratory science scope of practice.

Many practitioners currently practising in phlebotomy also work in specimen services and having a single scope of practice that encompasses these two distinct disciplines will allow for increased flexibility within the workforce while still maintaining the safety of the public. It will also allow for increased workforce flexibility in the area of donor technology.

Donor technicians are an established group under the current Medical Laboratory Technician scope of practice and the Council believes that this group should now be aligned with the scope of Specimen Technician.
Provide better descriptions of each scope of practice

There are no clear descriptors of the two current scopes of practice and this can lead to confusion especially in respect of the application of the scopes and the use of staff in each of the roles within the laboratory setting. Additionally, the Medical Laboratory Technician scope is very broad and does not account well for some activities. There are no clear boundaries and the use of restrictions is indistinct (e.g. phlebotomy).

Subsequently there is a very real potential for a lack of understanding from the public and clinicians who use laboratory services in respect of the various roles. This can be addressed through having clear descriptions for each scope of practice.
Defining Medical Laboratory Science

It is important that the Council provides explicit descriptions of what the profession of medical laboratory science is all about as well as the parameters for the associated scopes of practice. Having clear definitions helps to ensure the public understand the roles and responsibilities of medical laboratory science practitioners and they provide practitioners with better understanding of the parameters of their practice.

The Council is proposing a revised definition of medical laboratory science to include specimen services as a core laboratory practice, and acknowledge the distinct disciplines within which the profession of medical laboratory science is practised.

Medical Laboratory Science

Medical Laboratory Science is the collection, receipt, preparation, investigation and laboratory analysis of samples of human biological material for the purpose of supporting patient diagnosis, management and treatment and for the maintenance of health and wellbeing.

Medical laboratory science encompasses a number of distinct disciplines including:

- Biochemistry
- Blood Donor Services
- Blood Transfusion Services
- Cytogenetics
- Cytology
- Embryology
- Haematology
- Histology
- Immunology/Virology
- Microbiology
- Molecular Diagnostics/Genetics
- Mortuary Practice
- Phlebotomy
- Specimen Services

Medical laboratory science also includes:

- Medical laboratory management
- Medical laboratory science research and development
- Medical laboratory science teaching

Medical laboratory science is practised in diagnostic medical laboratories within both the public and private health sectors, and blood donor facilities. In a small number of circumstances medical laboratory science practitioners may work in the health sector but outside of the diagnostic medical laboratory setting and will require appropriate mechanisms to be in place to support their ongoing practice and competence.

In addition to the gazetted scopes of practice definitions, the practice of medical laboratory science is supported and informed by a Code of Competencies and Standards for the Practice of Medical Science in New Zealand (as issued by the Medical Sciences Council of New Zealand).
Medical Laboratory Scientist (generic description)
Medical laboratory scientists (scientists) collect, test and analyse human biological material to support patient diagnosis, management and treatment. They are skilled in the selection of appropriate samples and preparation for testing and analysis, and in the use of sophisticated laboratory equipment. Scientists analyse and interpret laboratory results and report their finding to referring clinicians. In certain circumstances they also advise of the need for further relevant testing.

While scientists typically practise in one or two of the disciplines within the medical laboratory science profession, their breadth and depth of training may allow them to practise across all disciplines (with appropriate training and demonstrated competency). This is with the exception of scientists practising embryology. Due to the specialised nature of embryology-related qualifications, scientists practising in that discipline will typically have their practice limited to embryology.

Medical Laboratory Scientist (provisional registration)
Provisional registration is applied when a practitioner has appropriate qualifications but lacks the required relevant New Zealand experience to practise independently as a medical laboratory scientist. Medical laboratory scientists who hold provisional registration are required to complete a period of supervised practice during which time they gain work-based knowledge and experience (including laboratory equipment and protocols). The period of supervised practice is determined by the Council on a case-by-case basis but will be no less than 3-months and no greater than 2-years. Supervision is provided by an approved registered health practitioner who holds a current practising certificate and has expertise and knowledge in the relevant discipline.

Medical Laboratory Scientist (general registration)
Medical laboratory scientists who hold general registration are able to practise without supervision.
Medical Laboratory Technician (generic description)
Medical laboratory technicians (technicians) collect, receive, prepare, test and analyse human biological material to support patient diagnosis, management and treatment. Technicians select appropriate samples and prepare those for analysis using the appropriate laboratory equipment and testing protocols. While technicians may analyse and interpret laboratory results they work within approved guidelines and protocols. Departures from defined parameters are to be referred to medical laboratory scientists or other appropriate, relevant and registered health practitioners prior to their release to referring clinicians. Technicians are qualified to practise in a particular discipline of medical laboratory science.

Medical Laboratory Technician (provisional registration)
Provisional registration is applied when a practitioner has appropriate qualifications but lacks the required relevant New Zealand experience to practise as a medical laboratory technician. Medical laboratory technicians who hold provisional registration hold qualifications that are approved as being relevant and are required to complete a period of supervised practice during which time they gain work-based knowledge and experience (including laboratory equipment and protocols). The period of supervised practice is determined by the Council on a case-by-case basis but will be no less than 3-months and no greater than 2-years. Supervision is provided by an approved registered health practitioner who holds a current practising certificate and has expertise and knowledge within the relevant discipline. Technicians practising in the mortuary discipline must be supervised by a registered pathologist (who holds a current practising certificate).

Medical Laboratory Technician (general registration)
Medical laboratory technicians who hold general registration can practise under the direction of a medical laboratory scientist who has expertise and knowledge in the relevant discipline. Within the parameters of “working under direction”, the technician takes full responsibility for his/her practice, with general oversight by an approved registered health practitioner who must be available for consultation if the technician needs assistance. The registered health practitioner providing direction must conduct periodic reviews of the technician’s practice.
Time to pause and consider some practical implications

In what circumstances will provisional registration be applied?
The provisional registration pathway applies to:

<table>
<thead>
<tr>
<th>Medical Laboratory Scientist</th>
<th>Medical Laboratory Technician</th>
<th>Specimen Technician</th>
</tr>
</thead>
<tbody>
<tr>
<td>New graduates of the Bachelor of Medical Laboratory degree issued by accredited New Zealand universities</td>
<td>Practitioners who hold an equivalent New Zealand base qualification – e.g. BSc (currently employed as laboratory assistants working towards registration)</td>
<td>New Zealand registered nurses with no specimen technology-specific experience</td>
</tr>
<tr>
<td>Practitioners who hold an equivalent New Zealand postgraduate degree – MSc, PhD (currently considered to be “in training” towards medical laboratory scientist registration)</td>
<td></td>
<td></td>
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<tr>
<td>Overseas-qualified practitioners who hold an approved qualification but lack NZ-based practice</td>
<td>Overseas-qualified practitioners who hold an approved qualification but lack NZ-based practice</td>
<td>Overseas-qualified practitioners who hold an approved qualification but lack NZ-based practice</td>
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</tbody>
</table>

In the previous document we talked about “vocational registration” but not in this one – why?
The Council’s original use of the term “vocational registration” was confusing and subsequently changed to “general registration”.

However there has been some preliminary discussion on the idea of introducing *vocational registration* to recognise particular specialisations of practices that, to protect the safety of the public, perhaps should not be performed by generally-registered practitioners.

The concept of vocational registration needs more work to better define any added value and the practical implications and has therefore not been included in this phase of the Council’s review. We expect to consult on this in the future.
How will it work for practitioners currently known as “scientists in training”?

**BMLSc Graduates**
Graduates of the Bachelor of Medical Laboratory Science (BMLSc) can register as medical laboratory scientists. Issue of their practising certificate includes a condition that they complete 6-months of supervised practice at which time they are re-issued with practising certificate exclusive of any conditions.

Placing conditions on a practitioner’s APC is subject to a series of procedural steps which can lengthen the time it takes the Council to process these applications.

Under the proposed framework, BMLSc graduates can register as a medical laboratory scientist (Provisional). Upon completion of a period of supervised practice and certification from a supervising scientist that they meet all of the required competencies, the provisionally-registered scientist can apply to the Council for registration and issue of a practising certificate as a medical laboratory scientist (general). This will significantly reduce the amount of processing time for applications (compared to issuing practising certificates with conditions).

**Postgraduate Science Degree**
Another current pathway to medical laboratory scientist registration is for people who hold a postgraduate qualification in a science-related degree (e.g. MSc, PhD) but have no clinical experience. They gain employment as a “trainee scientist” and complete a 24-month period of supervised practice in a NZ diagnostic medical laboratory. They are not registered during this period of training. Alternatively they may accumulate 24-months work experience in an overseas medical laboratory.

Under the proposed framework, practitioners who hold a postgraduate degree in science, either from New Zealand or overseas that has been deemed relevant to medical laboratory science, can apply for registration as a medical laboratory scientist (provisional). This allows the Council to ensure the practitioner is sufficiently monitored and supervised and is able to demonstrate all of the required competencies at the end of their period of supervised practice (at which point they can then apply for registration as a medical laboratory scientist (general). The period of supervised practice for a medical laboratory scientist (provisional) will be determined by the Council on a case-by-case basis but will be no less than 3-months and no more than 2-years.
**Graduate Diploma of Science Graduates**

The other category of “scientists in training” are those practitioners completing the Graduate Diploma in Science. These practitioners are registered medical laboratory technicians who undertake a 2-year training programme (including academic papers and clinical-based experience). Once they have completed the study programme they apply to change their scope of practice to a medical laboratory scientist. This currently requires them to complete a 6-month period of supervised practice upon being granted medical laboratory scientist registration.

Under the proposed framework a technician who has completed the Graduate Diploma in Science would be eligible for registration as a medical laboratory scientist (provisional) including a requirement to complete a minimum period of 3-months of supervised practice before being eligible to be registered as a medical laboratory scientist (general).

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What will happen if a Medical Laboratory Technician wants to move from working in one discipline to another discipline?

In this scenario the practitioner is still practising within the medical laboratory technician scope of practice.

Currently when a technician moves from one medical laboratory science discipline to another, this is managed by each laboratory.

Under the proposed framework moving from one discipline to another will come under the watch of the Medical Sciences Council. This is particularly important so the Council and public can be assured all practitioners moving from one medical laboratory science discipline to another receive on-the-job training in a consistent manner and to the same standards.

This will require the technician to complete a period of supervised practice (to be determined by the employing laboratory but to be no less than 3-months) and completion of a logbook in the relevant discipline. Once they have been deemed to be competent in the new discipline the practitioner will advise the Council (including submission of a completed logbook in the relevant discipline).
Currently there are some practitioners who hold a New Zealand-issued qualification (e.g. BSc) who are not registered and are employed as trainees while they gain laboratory experience working towards registration as a medical laboratory technician.

Under the proposed framework these practitioners would be registered as a medical laboratory technician (provisional). This will allow the Council to ensure the technician is sufficiently monitored and supervised and is able to demonstrate all of the required competencies at the end of their period of supervised practice (at which point they can then apply for registration as a medical laboratory technician (general).

The period of supervised practice for a medical laboratory technician (provisional) will be determined by the Council on a case-by-case basis but will be no less than 3-months and no more than 2-years.

It is important to note that **provisional registration only applies to practitioners who already hold a base qualification**. Subsequently trainees who are completing the Qualified Medical Laboratory Technician (QMLT) qualification are not required to be registered as a medical laboratory technician (provisional).

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**Will there be a separate scope of practice for mortuary technicians?**

No. Feedback from the initial consultation document and subsequent forum with industry representatives recommended that mortuary practice is appropriately encompassed as a distinct discipline within the medical laboratory technician scope of practice.
Defining the Scope of “Specimen Technician”

Please note the following definitions use the title *Specimen Technician* but the Council is keen to hear your thoughts on whether this is an appropriate title. Have a think about this and let us know your ideas when answering the question on this (when you complete the online questionnaire).

### Specimen Technician (generic description)
Specimen Technicians practise in the areas of laboratory specimen collection (commonly referred to as phlebotomy), laboratory specimen preparation (commonly referred to as specimen services), and donor technology.

The practice of specimen collection involves pathology laboratory specimen collection by following established procedures. Specimen collection includes collection of blood, non-blood specimens, and some specialised tests and procedures performed at the point of contact with patients.

The practice of laboratory specimen preparation involves the receipt and preparation of samples prior to laboratory testing.

The practice of donor technology involves the collection of blood and blood component donations from blood donors within the New Zealand Blood Service.

Phlebotomists can practise within a restricted capacity in either laboratory specimen collection or donor technology, or they may practise across both areas following successful completion of appropriate on-the-job training.

### Specimen Technician (provisional registration)
Provisional registration is applied when a practitioner has appropriate qualifications but lacks the required relevant New Zealand experience to practise as a Specimen Technician. Specimen Technicians who hold provisional registration are required to complete a period of supervised practice during which time they gain work-based knowledge and experience (including laboratory collection equipment and protocols).

The period of supervised practice is determined by the Council on a case-by-case basis but will be no less than 3-months and not greater than 2-years.

Supervision of Specimen Technicians is provided by an approved registered health practitioner who holds a current practising certificate and has relevant expertise and knowledge in the collection and preparation of samples for medical laboratory testing.
Specimen Technician (general registration)

Specimen Technicians practising laboratory specimen preparation and collection who hold general registration must work under the direction of a registered health professional (which can include a medical laboratory technician) who holds a current practising certificate and has relevant expertise and knowledge in the collection and preparation of samples for medical diagnostic testing.

Within the parameters of “working under direction”, the Specimen Technician takes full responsibility for his/her practice, with general oversight by an approved registered health practitioner who must be available for consultation if the Specimen Technician needs assistance. The registered health practitioner providing direction must conduct periodic reviews of the Specimen Technician’s practice.

Specimen Technicians practising in donor technology must work under the direction of a suitably qualified New Zealand registered nurse who holds a current practising certificate. Within the parameters of “working under direction”, the Specimen Technician takes full responsibility for his/her practice, with the supervising registered nurse providing general oversight in addition to being available for consultation if the Specimen Technician needs assistance. The supervisor must conduct periodic reviews of the Specimen Technician’s practice.

Some Practical Implications for a Specimen Technician Scope of Practice

Could an overseas-trained nurse with 10-years clinical experience (excluding NZ) register as a Specimen Technician (general)?

No. Any practitioner holding a relevant overseas qualification who has not worked in New Zealand before is eligible for registration as a Specimen Technician (Provisional). After completing a specified period of supervised practice (minimum of 3-months and up to 2-years) and provided certified evidence is received from the supervising practitioner as to their competence to practise, they may then apply to the Council for registration as a Specimen Technician (General).

Can a Specimen Technician practise in both laboratory specimen collection and donor technology?

Yes, provided they have completed a period of on-the-job training in the other discipline. A registered Specimen Technician practising in laboratory specimen collection (phlebotomy) can be employed in a donor technology role after completing 6-months (fulltime equivalent) of supervised practise and completion of a Qualified Donor Technician logbook. The converse is true for a Specimen Technician practising in donor technology with a completion of a Qualified Phlebotomist Technician logbook.
Can a registered Medical Laboratory Technician practise as a Specimen Technician?

Yes, however there are two distinct scenarios here. Medical Laboratory Technicians who perform specimen service tasks as a component of their wider technician role will be able to continue to do that within their Medical Laboratory Technician registration.

However should a Medical Laboratory Technician move to working within the parameters of a Specimen Technician scope only, then they would need to apply for registration in the Specimen Technician scope of practice and will need to be certified (by a registered medical laboratory scientist with relevant expertise and knowledge) as meeting the required competencies.

Can a registered Specimen Technician practise as a Medical Laboratory Technician?

Not without further formal training due to the difference in the range and complexities of procedures undertaken by Medical Laboratory Technicians in comparison to Specimen Technicians.

A Specimen Technician wanting to practise as a medical laboratory technician would need to complete the QMLT inclusive of 12-months laboratory experience. Because they already have a base qualification in medical laboratory science, they would be registered as a Medical Laboratory Technician (Provisional) during this period of further training.
Pulling it all Together

Will there be any kind of transitional arrangements for practitioners who are already working in laboratories and are affected by the proposed changes?

Yes. Once the Council has received and considered all of the responses to this consultation document and agreed on a final framework, a further report will be published.

That report will advise on the agreed framework for the scopes of practice within the medical laboratory science profession, details of how that is to be implemented, and the expected timelines.

What about practitioners who are working in non-clinical roles such as management and education?

This issue was discussed to a certain degree at the recent forum with industry representatives, and the Council recognises that this issue needs further investigation. However, we do not want to overload everyone with trying to sort through a multitude of complex issues all at once and have therefore decided that we will address this issue through a separate consultation process.
Thank You

The Council would like to thank you for taking the time to read through this consultation document.

Please tell us what you think about the proposed changes to the scopes of practice for the medical laboratory science profession

Your feedback is important. We acknowledge that the proposals contained in this document contain some very “meaty” issues and we therefore want to give you plenty of time to consider the implications of these.

You may want to get together with some of your colleagues to discuss and debate the proposals to help you firm up your thoughts and ideas.

When you are ready to put your responses “on paper” please complete the online questionnaire that you can access by clicking on the link under the “Consultation” button on the Home Page of the Council’s website at www.mscouncil.org.nz

You may choose to provide your responses as an individual or as a group of colleagues and/or various stakeholder bodies. Whatever way you choose is fine with us. We just ask that you complete the relevant questions as to your status and contact details (so we can make sure we alert you when the outcomes of the consultation have been finalised)

You have 8 Weeks to complete the online questionnaire.

The questionnaire will close on Friday 13th February 2015
Glossary

Scope of Practice

Under section 5 of the Health Practitioners Competence Assurance Act 2003 scope of practice is defined as

(a) Means any health service that forms part of a health profession and this is for the time being described under section 11; and
(b) In relation to a health practitioner of that profession, means 1 or more such health services that the practitioner is, under an authorisation granted under section 21, permitted to perform, subject to any condition for the time being imposed by the responsible authority.

Supervised Practice (Supervision)

Supervision means the monitoring of, and reporting on, the performance of a health practitioner by a professional peer. Supervision can be provided at different levels to accommodate the needs of the practitioner being supervised and to ensure the protection of patients at all times. It is expected practitioners will progress through some or all of a number of defined levels of supervision during their period of supervised practice.

Working under Direction

A practitioner who works under direction takes full responsibility for his/her practice, with general oversight by a suitably qualified and registered health practitioner who must be available for consultation if the practitioner needs assistance. A health practitioner providing direction must conduct periodic reviews of the practitioner’s practice.