



ICPM Update September 2021

The ICPM Board has continued to work with the Department of Health (DoH) Environmental Health Unit to develop protocols and requirements to facilitate the establishment of the Ministers Register of MPEs. It has been a slow process, delayed by Covid on several occasions, but continues to progress.

ICPMs key achievements over the past 2 years

In 2020 a joint application by the ICPM and the IAPM (as the National Member Organisation of EFOMP) was made to EFOMP for recognition of our National Registration Scheme (NRS). In 2021 Ireland was one of the first five EU countries to meet the NRS standards of EFOMP. The recognition of our scheme by EFOMP will go to ensure that the requirements of the MPE in Ireland, negotiated with the Department of Health, will meet the high standards of RP 174 and EFOMPs Professional Matters Committee.

In order for the ICPM to consult with the Minister, under Article 19 of SI 256(2018)¹, the ICPM was established as a Company Limited by Guarantee in 2020, and has engaged a company secretary to manage the reporting arrangements for a limited company. An application has been made to the Department to reimburse the set-up costs and annual fees in relation to the company affairs.

The ICPM has continued to engage with the Department of Health, negotiating the “Requirements for Recognition as a MPE” for both the initial application and future recertification processes. As part of our preparatory work, a survey of members was undertaken to ensure, as far as possible, that the requirements of the Minister’s Register will be achievable by our members, while maintaining the standards set by EFOMP for accredited national registration schemes. The results of this survey were presented at the IAPM ASM in 2020.

¹ <http://www.irishstatutebook.ie/eli/2018/si/256/>

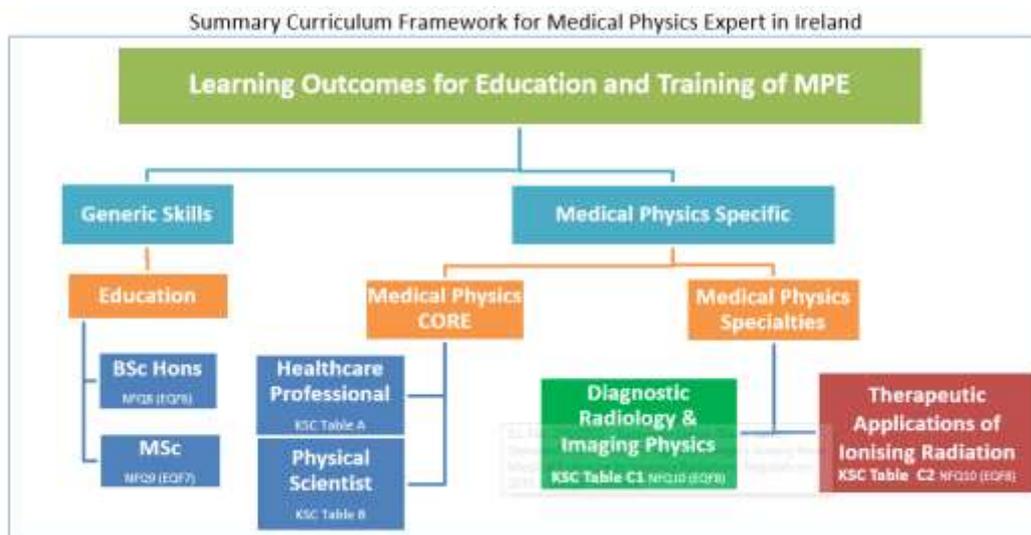
Requirements for entry to the Minister’s Register

Requirements for entry to the Register of Medical Physics Experts will be based on EU RP174² and the ICPM constitution, with the following two specialisations within the ionising radiation remit:

- (i) Diagnostic Radiology & Imaging Physics – including Nuclear Medicine (D&R+NM)
- (ii) Therapeutic Applications of Ionising Radiation (RT)

Nuclear Medicine has been included within the Diagnostic Imaging speciality as this is the most common division of responsibility in Ireland. However, it has been proposed that anyone who feels they do not meet the full requirements for a combined specialisation of D&R+NM may request an exclusion condition under Article 19(7) of SI 256 (2018)., for example registration for Diagnostic Radiology excluding Nuclear Medicine or vice versa.

The draft requirements will specify the Knowledge, Skills and Competencies (KSC) that the MPE should possess at an academic level, core medical physicist level and at specialist (expert) level, complying with RP174 Annex I³, as summarised in Figure 1 below:



Note: Table A: MPE as Healthcare Professional Table B: MPE as a Physical Scientist, Table C1: KSC Specific for the MPE in Diagnostic Radiology & Imaging Physics (Diagnostic & Interventional Radiology incorporating Nuclear Medicine), Table C2: KSC Specific for the MPE in Therapeutic Applications of Ionising Radiation (Radiation Oncology/ Radiotherapy)

Fig1: Summary of Knowledge, Skills and Competency (KSC) requirements for Medical Physics Expert.

² <https://ec.europa.eu/energy/sites/ener/files/documents/174.pdf>

³ https://ec.europa.eu/energy/sites/ener/files/documents/rp174_annex1.pdf



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Each applicant will be asked to provide sufficient evidence for each stage of their training; education to at least NQF Level 9 MSc, 2 years of core clinical training and 3 years additional professional development in their chosen speciality. The ICPM Board are satisfied that the Minister's requirements will meet the standards set by the EFOMP National Registration Scheme and RP 174, while having the flexibility to ensure that all current ICPM members will be in a position to apply for recognition as an MPE.

The registration scheme will accommodate both those who have participated in a structured accredited training programme as well as those who train "on the job" outside a formal training and assessment programme. For Medical Physicists who trained outside a structured training programme, we recommend keeping a portfolio of evidence matched to the Knowledge, Skills and Competencies of RP174 Annex I³ to ease the burden on preparation of an application. Recent applicants seeking ICPM membership have provided evidence of their advanced experience and expertise by relating it to the corresponding KSC laid out in Annex I of RP174. As well as giving the applicant structure for their submission, it also enhances the review process significantly.

The ICPM will engage with a provider to develop a full website with built-in member's area functionality, and work has begun in this regard with Passion for Creative (the IAPM website developer). The website will give members a personal space to log evidence of training and CPD. We are awaiting funding from Department of Health to establish the website and online portal, as an essential tool for ICPM members, before the register is established. The ability to compile and save evidence in advance of the opening of the Minister's Register will, we hope, make the application process a more efficient task for our members.

The Minister's Register

When the Minister's Register comes into being, every medical physicist seeking official recognition as a Medical Physics Expert will have to make an application to be on that Register. Applicants will be asked to apply to the Environmental Health Unit of the Department of Health, using the application form developed by the Department of Health in consultation with the ICPM.



Once established the register will take a similar form to the RPA list on the EPA website. The Department website will list all MPEs with their expiry date, while those who intend to offer services to third parties applicants will be invited to provide their contact details for publication.

Registration will last 5 years, with renewal based on CPD meeting the standards established by the ICPM and accepted by the Minister.

Transitional arrangements

While waiting for the Minister's Register to be established, undertakings are still under a legal obligation to appoint an MPE with the knowledge, training and experience to act or give advice on matters relating to radiation physics applied to medical exposure, who must take on the roles and responsibilities of regulation 20. We encourage members to use their membership of the ICPM as an assurance that they have the knowledge skills and competence to act in the capacity of MPE.

Once established the Minister will adopt the list of "ICPM members" in the categories D&IR+NM and RT as a *temporary* register. However, on expiry of the ICPM Membership Certificate each member will have to make a *first-time* full application to the Minister. The ICPM is aware this is may be time-consuming task for full members and hence aim to encourage and facilitate members through this process using the website portal and other supporting mechanisms.

The requirement for a full application for those on the temporary register is because the ICPM is not holding on file certified copies of academic achievements, nor full records on training schemes / evidence of on the job training for all members. The current ICPM voluntary register does not hold all of the available evidence (e.g. MSc certificate etc) in the detail required to register each member currently. Although ICPM members submit CPD annually the quality of submission varies and is not easily matched to the competencies of RP 174. Hence we will be unable to give the DoH automatic assurance that each and every one of our members meets the standards set by the Minister and mandated by the Professional Regulation Unit of the DoH using the existing data.



We encourage all members to consider starting the compilation of evidence as early as possible, such as

- Certified copies of academic achievements
- Evidence of completion of a structured training scheme
- Evidence of any unstructured training undertaken.
- In lieu of a structured accredited training scheme, a record of continuous professional development matched to the Knowledge Skills and Competencies expected of an MPE (RP 174 Annex I³).

ICPM Role after establishment of the Register

The ICPM will act as advisors to the Minister. In effect all applications to the Minister will be forwarded to the ICPM for consideration, and the ICPM will make a recommendation to the Minister as to the acceptance, or otherwise of a candidate.

The ICPM must also be adequately protected for the advisory role it will undertake, and to that end have applied to the Department of Health for funding to cover the not insubstantial costs of insurances (Directors and Officers, Cyber security and Professional Indemnity)

Timescales

The Requirements document and associated application forms are expected to be finalised by September 2021. These will be reviewed within DoH by the Professional Regulations Unit and legal drafters before going to a wider consultation to be held with relevant stakeholders, including ICPM members and other bodies such as the HSE and the EPA. This consultation process will feed into a final agreement between the ICPM and Department of Health expected in Q1 2022. The ICPM will continue during this time to negotiate the Service Level Agreement with the DoH for the consultancy function and expertise on Medical Physics Expert it will provide to the DoH as part of the MPE registration process.

In the interim, concerns have been raised by HIQA that an offence is on the statute books while Undertakings are not in a position to comply; it is an offence for an Undertaking not to appoint an



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MPE registered by the Minister. To correct this anomaly, until such time as the Register is established, the Department proposes to modify Article 19¹, while retaining Article 20 Responsibilities of Medical Physics Experts. The DoH legal drafters are preparing this amendment to the S.I. now. This modification could imply that the MPE Register applies only when it comes into existence. This leaves a temporary vacuum for recognising MPE. The ICPM encourage its members on the ICPM voluntary register to promote their capacity to be an MPE based on their existing acceptance onto the ICPM voluntary MPE Register, noting that the ICPM has been recognised internationally by EFOMP accreditation as a National Registration Scheme for the MPE.

To make contact with the ICPM Board please contact at medphys.icpm@gmail.com