



Consumers
Health Forum
of Australia

**Submission on the proposed arrangements for specialists within
the National Registration and Accreditation Scheme for the Health
Professions**

February 2009

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Introduction

The Consumers Health Forum of Australia Inc (CHF) is the national voice for health consumers. As an independent non-government organisation, CHF helps shape Australia's health system by representing and involving consumers in health policy and program development (see Appendix 1). For many years CHF has advocated for consumers to be active partners in decisions affecting their health.

In this submission¹ CHF considers key issues for consumers identified in the National Registration and Accreditation Scheme for the Health Professions Consultation Paper², '*Proposed arrangements for specialists for the National Registration and Accreditation Scheme for the Health Professions*'.

CHF has based this submission on discussions with consumers about health specialists over a number of years, including recent input from CHF members and consumer representatives about the proposed arrangements³. It builds on the five submissions that CHF has provided on the National Registration and Accreditation Scheme, including the submission on the proposed registration arrangements for the health professions⁴, which discusses registration arrangements for specialists.

The key recommendations in this paper are based on the principle that health care works better when consumers are partners in decision-making and that consumers need information to help them to make informed decisions about their health care. This submission also stresses the importance of the views of health consumers balancing those of health professionals. The Scheme must work for consumers.

The National Registration and Accreditation Scheme

The National Registration and Accreditation Scheme (the Scheme) was established by the Council of Australian Governments (COAG) in March 2008. CHF welcomes the establishment of NRAS as it will take safety and quality to a new level in Australia. Health professionals will be assessed against national standards, closing the gaps and inconsistencies between the states and between professions.

For consumers, the Scheme provides for a central place to check health professional registrations and endorsements and opportunity to raise any concerns about their health services, while being sure that they will be directed to the right place for action and that their health care will not be compromised. Consumers have a valuable viewpoint to contribute so that the Scheme is the best it can be and has consumer confidence.

The proposed arrangements for specialists

The consultation paper arose out of a review of submissions to the NRAS Implementation Scheme indicating the need to clarify the proposed arrangements for specialists.

¹ This submission is part of the CHF Shaping the Health Workforce Project 2008-09, funded by the Australian Government Department of Health and Ageing on behalf of the Practitioner Regulation Subcommittee of the Health Workforce Principal Committee and the National Registration and Accreditation Project team.

² See <http://www.nhwt.gov.au/natreg.asp>

³ This includes written input on the proposed arrangements for Specialists from CHF consumer representatives.

⁴ Available on the CHF website at <http://www.chf.org.au/Docs/Downloads/493-registration-submission.pdf>

For example, the CHF submission on the proposed arrangements for registration stated that given the strong consumer interest in better understanding and having better information about the qualifications and experience of their health professionals, endorsements such as ‘medical specialists’ or ‘dental specialists’ do not seem to provide the level of detail that consumers would expect. CHF requested further work on endorsement to consider whether specialist recognition is required under the Scheme for professions other than medicine, dentistry and podiatry. CHF again urges the Government consider the principle of public interest as being fundamental to these considerations.

Key areas addressed in the proposed arrangements consultation paper are:

- Specialist endorsement
- Continuing competence requirements
- Protection of specialist titles
- Registration of specialists
- Scope of practice

Specialist endorsements

Health consumers want information about health professionals’ qualifications, training and area of expertise to help consumers make decisions about their health care. As a result CHF supports both annotation and endorsement of ‘specialist’ status in the register for all professions under the Scheme.

Where endorsements cannot be met, CHF supports annotation of health professional claims regarding experience. However, the register must make it evident to consumers that annotation is not endorsement. If health professionals are not accredited then the register needs to clearly be marked that way. Annotation will also be useful to consumers while transition arrangements are in place to bring health professions on to the register.

What should be endorsed?

It is important for consumers to be able to understand what the specialists do and the difference between the different specialties. Given the strong consumer interest in better understanding and having better information about the qualifications and experience of their health professionals, endorsements such as ‘medical specialist’ or ‘dental specialist’ do not provide the level of detail that consumers would expect.

As a result, specialist endorsement on the register must provide consumers with information on the speciality or sub-speciality in which the practitioner is credentialed; for example, general surgery, renal surgery, and neurosurgery. Endorsement must be linked to approved national competency standards, training and qualifications.

It is crucial that the register prevents health care professionals claiming specialist qualifications inappropriately, eg overseas trained doctors claiming to be surgeons, eg in the cosmetic industry. All health professionals must meet Australian national standards, not overseas ‘equivalent’ standards.

Protecting the public interest

CHF strongly holds the view that protecting the public interest must prevail when developing the register. Specialist endorsement of all professions will protect the public interest by:

- Providing information to help consumers make informed decisions about their health care, including who they should see for particular advice, conditions and procedures
- Ensuring that health care professionals, including overseas trained health care professionals, do not claim to be specialists in areas that are not recognised in Australia, and therefore do not meet appropriate standards and qualifications

- Improving safety and quality in health care
- Protecting consumers from seeing health care providers who are unable to offer them the advice or treatment they require.

Funding

While accepting that endorsement is, and needs to be, separate from funding and employment issues, it is important that funding arrangements, such as Medicare, take account of the decisions regularly updated on the register.

Consumers need to have confidence in the process that allows a practitioner in Australia to be granted specialist endorsement.

Consumer expectations of the register

Consumers expect to see the register provide up-to-date, accurate information and clarification about health professional status through endorsement or annotation.

Consumers expect the register to be nationally consistent in how it informs consumers, however, until all the professions that are part of the Scheme develop appropriate arrangements to meet the requirements of the Scheme, the lowest common denominator for nationally consistent accreditation, registration and specialist endorsement across the professions should not prevail.

Consumers expect that the national register will be useful to them in making important decisions about their health. Health literacy levels therefore need to be taken into account when developing the register.

Registration status, annotation and endorsements must be clear to consumers and easy to understand. Further, information and assistance must be made available to consumers who require it. CHF recommends that this could be through a 'one-stop-shop' national website and telephone line.

Scope of practice

It is important that professional boards check with each other before establishing new specialities. Consumer consultation on this is crucial.

Area of need

Access to health services in areas of need is important to consumers. Consumers want nationally consistent criteria and processes for determining requirements in areas of need, such as rural or regional areas. Consumers do not want a two-tiered health system where areas of need have lower standards. Areas of need must be supported by appropriate regional and/or metropolitan health 'systems'.

Conclusion

Consumers expect the National Registration and Accreditation Scheme to be easily accessible and provide them with up-to-date, accurate information to help them to make informed decisions about their health care. Specialist endorsements and annotations will help consumers to make these important decisions about their health care.

Consumers have a valuable viewpoint to contribute so that the Scheme is the best it can be and has consumer confidence. CHF recommends ongoing consumer involvement in the developed of the NRAS, including involvement of consumers in the development of criteria for recognition of specialities. The Scheme must work for consumers.



Background information

The Consumers Health Forum of Australia Inc (CHF) is the national voice for health consumers. As an independent non-government organisation, CHF helps shape Australia's health system by representing and involving consumers in health policy and program development.

Health consumers have a unique and important perspective on health as the users and beneficiaries of health care and, ultimately, those who pay for it. CHF takes consumers' views to government and policy makers, providing an important balance to the views of health care professionals, service providers and industry to achieve a health system that reflects the needs of all stakeholders.

CHF member organisations reach millions of Australian health consumers across a wide range of health interests and health system experiences. Health policy is developed through wide consultation with members, ensuring a broad, representative, health consumer perspective.

Current priorities include safety and quality in health care, safe and appropriate use of medicines and health care for people with chronic conditions. CHF also facilitates the appointment of consumer representatives on over 200 national health-related committees.

CHF believes all consumers should receive affordable, safe, good quality health care at the time they need it. The best outcomes are achieved when consumers are involved in decisions about and management of their own health care. Consumers should receive health care information when they need it in a form they can understand, particularly about using medicines.

Established in 1987, CHF receives funding from the Australian Government Department of Health and Ageing and membership fees. It seeks external funding for priority projects.

With its ability to access a variety of health consumer networks and extensive knowledge of consumer issues, CHF is a respected and influential contributor to the Australian health debate.

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