

A HEALTHIER FUTURE FOR ALL AUSTRALIANS

Interim Report of the National Health and Hospitals Reform Commission

SPEECH PATHOLOGY AUSTRALIA SUBMISSION - March 2009

Speech Pathology Australia welcomes the opportunity to respond to the Interim Report of the National Health and Hospitals Reform Commission and commends the Commission on its comprehensive report and its commitment to 'operationalising' the reform agenda. Speech Pathology Australia is the peak body in Australia representing speech pathologists and the consumers of speech pathology services. Speech pathologists may be the first point of contact within the health system for clients with communication and swallowing disorders that may present across the life span.

Key points for consideration:

1. **Speech Pathology Australia** strongly supports the creation of a **strong primary health care system**. This needs to be complimented by adequate and highly specialised services at acute and subacute levels.

Comprehensive Primary Health Care centres need to move away from a medical model, and must be inclusive **of the full range of allied health professionals, including speech pathologists**, to meet the an individual's needs across the lifespan. The emphasis should not only be on chronic illness but address the complete spectrum of developmental and acquired conditions. There can be a common perception that Chronic Disease only includes specific medically based conditions (ie diabetes, heart disease etc) while ignoring developmental disabilities that are not only complex and long term, but also potentially impede all facets of an individual's social, educational and emotional wellbeing.

2. **Definition of Primary Health Care** on pages 6 and 81 makes reference to 'registered professions', however not all health professions are currently registered. Speech pathology is currently only registered in Queensland but has made submission to be included in the National Registration and Accreditation Scheme. Whether included in a national regulatory scheme or not should not preclude speech pathology from holding a firm place as a member of the primary health care workforce.

3. The speech pathologist, as a **primary health care provider**, should have **rights to refer to specialists** as required. Accessibility to care in a timely and efficient manner is essential for best health outcomes. Time and resources are wasted by the need to refer to specialist services through the GP. Examples include where a speech pathologist identifies a potential vocal tract disorder which requires ENT investigation, or identifies speech and language problems consistent with autism. Currently both scenarios require the patient to return to the GP for referral to a specialist, thereby delaying both diagnosis of the patient's condition and the commencement of treatment.

4. Speech Pathology Australia welcomes the emphasis on **nurturing a healthy start to life**. As a contributor to the development of the "Get Set 4 Life – Habits for Healthy Kids", Speech Pathology Australia applauds the Commonwealth Government's **commitment to reform of early childhood education and care**. Such strategies will assist in the early identification of children with specific speech and language difficulties and other developmental delays, and provide the opportunity for timely intervention.

5. We support encouragement of national leadership on **health promotion and prevention**. While specific preventative health strategies are focussing on major health priorities, we again draw the Commission's attention to the need for health promotion and prevention programs directed toward broader developmental, learning and life skills. Both national and international research has clearly demonstrated a link between early childhood development, including speech and language competence,





and school readiness, academic performance, employment and social integration. Speech pathologists possess the knowledge and skills that allow them to work with children, families and education agencies to develop programs which would ensure that 'at risk' children are provided with a home and social environment that maximises their health and development.

6. A review of **health funding** is required to ensure fair access to services for all. While a dual system of funding (public and private) is supported, there must in the first instance be adequate public funding at all levels of the health system. Public funding is currently inadequate, with long waiting lists and a need to prioritise services toward the most in need. Many families will attempt to access private services, but find the cost prohibitive.

Speech Pathology Australia has welcomed the profession's inclusion in **MBS**; however the number of subsidised allied health sessions available to consumers is inadequate and **must be extended**. Current arrangements emphasise assessment and brief intervention rather than the sophisticated mix of care that is most effective for chronic and/or complex care. Speech pathology services under the Enhanced Primary Care items are restricted to 5 consultations per year for all allied health, while the new Autism items are limited to 20 consultations (in total) across the relevant allied health providers. The nature of complex communication and swallowing disorders necessitates long term speech pathology input to maximise outcomes – the current Medicare items do not meet these needs and the resultant provision of care is not consistent with best practice guidelines.

7. A **sustainable health workforce** is essential, which at present is being compromised by lack of incentives and structures to recruit and retain qualified professionals. Flexibility of employment arrangements and support (both financial and professional) to maintain recency of practice and encourage practitioners back into the workforce will work towards maintaining a return on the investment in educating health professionals. **Workforce data** must be collected and projected against patient demand for **all health professions**, and not just for those who will come under the National Registration scheme.

8. A **framework of competency based training and practice** is not new for the speech pathology profession with it having a well established commitment to competency based standards and learning. The profession's **competency based occupational standards (CBOS)** is applied to entry level standards for eligibility for practising membership of Speech Pathology Australia, its accreditation of university speech pathology programs, overseas qualifications assessments and student clinical education assessment. Speech Pathology Australia contends however that while there is a place for interdisciplinary learning, competency based education and practice must retain profession-specific skills and knowledge.

For further information contact:

Gail Mulcair
Chief Executive Officer
Speech Pathology Australia
16 March 2009

2nd Floor, 11 – 19 Bank Place, Melbourne Vic 3000
Telephone: 03 9642 4899 Fax: 03 9642 4922
Email: gmulcair@speechpathologyaustralia.org.au