

Health Identifiers and Privacy:
Discussion paper on proposals for legislative support
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SPEECH PATHOLOGY AUSTRALIA SUBMISSION – 14 August 2009

Speech Pathology Australia welcomes the opportunity to respond to the **Discussion Paper: Health Identifiers and Privacy – proposals for legislative support**. Speech Pathology Australia is the national peak body for speech pathologists in Australia, representing approximately 4,500 members. Speech pathologists are university qualified health professionals who provide a variety of services to people with communication and swallowing difficulties that may present across the life span. Speech Pathology Australia also aims to represent the interests and needs of consumers of speech pathology services.

Speech pathologists may often be the first point of contact within the health system for clients with communication and swallowing disorders. Speech pathologists play a fundamental role in the management of complex health conditions and work widely across the health system in the acute, sub-acute and primary health care sector, in addition to working with those in aged care settings. Speech pathologists maintain a focus on working in a multidisciplinary model, and consult and liaise closely with their medical, nursing and allied health colleagues to ensure a holistic approach to health care and management of their clients' communication and swallowing needs.

Key points for consideration:

1. **Speech Pathology Australia** strongly supports the initiative of the Australian Health Ministers Advisory Council (AHMAC) and NEHTA in the development of a robust e-Health Strategy which includes the introduction of National Healthcare Identifiers. Speech Pathology Australia agrees that the accurate identification of individuals and healthcare providers is vital when communicating electronically and that these identifiers can be utilised to minimise the likelihood of information being sent to the wrong healthcare provider or being assigned to the wrong patient. Importantly unique identifiers for providers is seen as a key to ensure the patient's team of health professionals communicate efficiently and accurately with regard to the ongoing health management of each individual. This will result in better coordinated care and provide health services within a safe and quality framework.

2. Providers to be allocated HPI-Is

For all the reasons above, it is vital that from the outset, all key members of the healthcare team are included in a system of assigning unique provider and organisation identifiers. It is therefore of significant concern to Speech Pathology Australia that the current proposal plans to only include the professions that come under the National Registration and Accreditation Scheme in the initial roll-out of the Healthcare Identifiers.

Under A.3.1, it is proposed:

Healthcare Provider Individual Identifiers (HPI-Is)

- will be issued to any individual involved in providing healthcare who requires one ⁽¹⁹⁾ with this qualified as meaning:

19 Initial allocation of HPI-Is will be to healthcare professionals registered on a national basis through the National Registration and Accreditation Scheme (NRAS)...





This however is in contrast to the third dot point in this section that refers to HPI-Is being issued to - an individual healthcare provider through their **professional** or registration **body**, where one exists ... allowing a pathway to work in conjunction with the professional peak bodies.

Speech Pathology Australia meets the second criteria as outlined above of being the professional body representing speech pathologists in Australia and therefore contends that plans for initial roll out be reconsidered to include **all relevant health professionals, including speech pathologists**.

Speech Pathology Australia recommends the following:

Allocation of HPI-Is be based on the health professionals who are employed in the public and private health system and/or are eligible to be registered with Medicare Australia for the purposes of Medicare rebates.

It is also reinforced that **all such professionals are given access at the same time**, and not just those professions under the national registration scheme.

As the Health Identifiers System is likely to be administered through Medicare Australia, there will be systems already in place to capture the details of those professionals registered for Medicare. In addition, Medicare Australia has an existing system in place whereby the qualifications of speech pathologists registering for the first time are checked by Medicare Australia through contacting Speech Pathology Australia for verification. Speech Pathology Australia would therefore be very willing to work in partnership with Medicare Australia to facilitate a system of 'registering' appropriately qualified speech pathologists as appropriate to be allocated an HPI-I.

3. Failure to introduce Health Provider Identifiers to all key health professions at the same time will lead to a **fragmented system and an inability to facilitate a truly coordinated service**.

To illustrate this point, we ask that the following scenario be considered:

Mrs Smith, a 73 year old woman, is admitted to hospital following a stroke. In accordance with protocols for stroke management, Mrs Smith is not given anything to eat or drink until her swallowing is assessed by a speech pathologist. Due to unsafe swallowing (dysphagia), the speech pathologist recommends a texture-modified diet and specific swallowing therapy for Mrs Smith. The speech pathologist communicates this in Mrs Smith's medical record and liaises with the multidisciplinary team managing Mrs Smith, including the dietitian, nurses and food services staff.

Mrs Smith is discharged home to the community on day 7 after her stroke. A hospital Discharge Summary is received by the GP which recommends, amongst other things, that due to her ongoing swallowing problems, Mrs Smith continue on a texture modified diet. However, the details of the recommended diet and the swallowing therapy Mrs Smith requires are not provided in the Discharge Summary. The GP requires clarification of these recommendations so as to ensure Mrs Smith is not placed at risk of an adverse event associated with her dysphagia, eg choking, malnutrition, chest infection, yet due to the speech pathologist not having a HPI-I, is unable to readily contact the speech pathologist. Patient safety and well being are clearly at risk in this scenario. Provision of a HPI-Is to the speech pathologist would facilitate ease of communication of key speech pathology recommendations to the GP, as well as facilitate ease of communication between other relevant health professionals such as the dietitian and physiotherapist.

4. Having a **two-tier approach** to introducing Healthcare Provider identifiers makes no sense in terms of a communications and education strategy in rolling out the scheme. It will cause confusion and disadvantage to those professions that are not registered nationally, and more importantly will not lead to the desired benefits of streamlining health related communications and providing for a seamless and efficient means of informing on patient healthcare management.



Summary:

Speech Pathology Australia supports the introduction of unique healthcare identifiers for consumers, individual healthcare providers and healthcare organisations and congratulates NEHTA on this step towards a national electronic health record.

We strongly recommend however that all health professionals, **including speech pathologists**, be included at the **initial stage of roll out of HPI-Is**.

We caution that this is the only effective way of this new system having any rigour and credibility.

Speech Pathology Australia would welcome further discussion on these points.

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