

A HEALTHIER FUTURE FOR ALL AUSTRALIANS

National Health Reforms

SPEECH PATHOLOGY AUSTRALIA SUBMISSION TO THE FEDERAL HEALTH MINISTER

December 2009

Speech Pathology Australia welcomes the opportunity to respond to the recent suite of proposed health reforms aimed at creating 'a healthier future for all Australians'. We congratulate the government in taking steps to address an over burdened health care system.

In particular we are pleased to comment on the National Health and Hospitals Reform Commission's Final Report June 2009; 'Building a 21st Century Primary Health Care System: A Draft of Australia's First National Primary Health Care Strategy and Australia'; and 'The Healthiest Country by 2020 (National Preventative Health Strategy), Overview June 2009'. While these are separate and targeted reviews, there is also a high degree of overlap in principles and overall directions, and this response makes comment in general and on specific aspects of the health and hospital, primary care and prevention strategies.

Speech Pathology Australia is the national peak body in Australia representing approximately 4,500 members and 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 and thus play a crucial role in the provision of services promoting optimal consumer health outcomes.

Speech Pathology Australia is a member of the Allied Health Professions Australia (AHPA) and supports the 'Guiding Principles and Criteria for a new design of our health system', as has recently been released (AHPA, 2009). Speech pathologists are key members of the allied health team, and as is the case for other allied health professionals, speech pathologists work across the continuum of care: health promotion, prevention, early identification, intervention and treatment, and management of health conditions. We support the critical notion that consumers must have access to the '*right practitioner, in the right place and at the right time.*' We further contend that speech pathologists are the 'right practitioners' to assist individuals who demonstrate, or who are at risk of developing, life-impacting communication and swallowing difficulties. Access to appropriate and timely speech pathology services is a right of all Australians.

Key areas for comment:

1. Connecting and Integrating Care

Speech Pathology Australia strongly supports the creation of a **comprehensive and multi disciplinary primary health care system including a Primary Health Care Organisation**. This must 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 an individual's needs across the lifespan. Emphasis should not only be on chronic illness but also address the complete spectrum of developmental and acquired conditions. There is a common misconception that Chronic Disease only includes specific medically-based conditions (i.e. diabetes, heart disease etc) while ignoring developmental disabilities and acquired conditions of a chronic nature that are not only complex and long term, but also have the potential to impact all facets of an individual's social, educational and emotional wellbeing.





The governance and implementation of new primary health care organisations and centres must include the knowledge and expertise of allied health professions, including speech pathology, to ensure services provided are comprehensive, efficacious and targeted to meet the needs of the local community. Speech pathology must be viewed as an integral member of primary health care teams and that these do not just involve the 'registered professions' (as per definition under the NHHRC report).

2. Embed Prevention and Early Intervention – ‘Nurturing a Healthy Start to Life’

Speech Pathology Australia welcomes the emphasis on **nurturing a healthy start to life and supports embedding prevention and early intervention** through universal as well as targeted services. Speech pathologists possess expert skills in the development of speech, language and literacy skills, playing a pivotal role in the prevention, early identification and intervention of children and young people with specific speech and language difficulties and/or developmental delay.

Universal (population based) health promotion programs and targeted 'special needs' services are essential to ensuring Australia's children have the necessary language, literacy and learning skills to enable them access to the curriculum and as a foundation for their future. With the recent release of the data from '2009 National Report on the Australian Early Development Index (AEDI)', highlighting that as high as **18.1% of five year olds are vulnerable with respect to language and communication outcomes**, it is clear that speech pathologists are critical for ensuring good health and social outcomes for these children. Speech pathology will play an important role in designing and implementing prevention and targeted programs for children vulnerable to poor communication outcomes, and through education and consultancy services, can support early childhood educators, school nurses and teachers working with these children across their early years and into young adulthood.

Adequate speech pathology services must be available to children with specific speech, language and literacy impairments. Supporting access to publicly available and private speech pathology services must be addressed as a matter of urgency, given the high unmet demand and long waiting times for assessment and ongoing treatment. Integration of early intervention and school based services is critical, with coordination across health and education jurisdictions. Australian studies indicate that **around 20% of children are slow to develop spoken language** and that for around **50% of these children, language problems persist into the early school years**. Universal access to speech pathology services for children of school age should be mandated, as against the current inconsistent access to services across differing states and territories of Australia. Further to this, speech and language disorders have been demonstrated not only to lead to difficulty in acquiring literacy and poor long term achievement, but are also associated with reduced employment options, social, emotional and behavioural problems across the life span, mental health problems, and criminal behaviour leading to juvenile offending and imprisonment.

3. Integrating Health and Aged Care

With an ageing population and estimated growth in the prevalence of dementia and other chronic conditions in Australians aged over 65yrs, Speech Pathology Australia welcomes recommendations to enhance the connection and integration of health and aged care. An estimated 16-22% of Australians over 50yrs old experience difficulty swallowing and more than **45% of Australians with dementia experience communication difficulty**. Speech pathologists as communication and swallowing specialists are involved in promoting effective communication, and comfort and safety with swallowing, a fundamental requirement for maintaining an older person's health and quality of life.

The Aged Care Funding Instrument (ACFI) and Aged Care accreditation systems currently fail to adequately ensure that residential aged care services provide the necessary speech pathology services to meet residents' communication and swallowing needs.

4. Equity and Access

Speech Pathology Australia supports equity and access of all Australians to services delivered by the **right practitioner, in the right place and at the right time** for optimal consumer health outcomes.



Speech Pathology services need to be available for identified high need groups, with flexible funding models to ensure services address local health needs and priorities, **including services for those who are disadvantaged, Aboriginal and Torres Strait Islander communities**, and those from rural and remote Australia. Significant and chronic problems in hearing, speech/language development and literacy exist within Indigenous populations. Equitable and timely access must be supported through innovative service models that are appropriately resourced.

While it is recognised that there is a shortage within the speech pathology workforce across all geographical areas, specific shortages across rural and remote areas need to be addressed through **incentives that should be equitable across all health professions**.

Speech Pathology Australia supports National Access targets; however Key Performance Indicators (Access targets) should be broader than just hospital and medical measures, addressing and measuring targets across the continuum of care throughout the whole of the health system. For instance, national targets should be established in relation to accessing initial speech pathology assessment and ongoing treatment for individuals with this identified need. Based on these agreed targets, services can evaluate when targets are not able to be met and if additional speech pathology services are required.

5. Governance and Funding Models

Speech Pathology Australia supports the Federal government's move towards a **'one health system'**, with the Commonwealth assuming funding of primary health care, dental and aged care and a move towards strengthening sub-acute care.

A well-designed funding model with strategic purchasing of services to enable fair access to services for all Australians is essential. Funding models must recognise and enable those Australians with communication and/or swallowing disorders access to speech pathology services as needed. Access should not only be for high priority or highly complex conditions but also for the full range of developmental and acquired conditions. The recommendation of 'Enhanced package of care' funding may address this, however there is a need to ensure 'bundled payments' or packages of care funding for non-episodic treatment, such as may be the case for protracted speech pathology services, **are adequate and flexible to meet clients' complex needs**.

A review of the Medicare Benefits Schedule (MBS) services should have an evidence base when considering new or extended items. While recognising the care coordination role of GPs, direct access to Medicare rebated allied health services should be introduced to reduce duplication of services and delay in access caused by the need to go through the GP for referral.

Speech Pathology Australia provides only cautious support for Medicare Select as more detail on inclusions within government health plans with respect to allied health is required. There is an inherent potential for inequity across services and constraints under the different non-government plans and assurance is required that there will be adequate minimum allied health services available across all plans.

6. Modern, Learning and Supported Workforce

A modern, learning and supported health workforce, inclusive of speech pathologists, is essential in achieving long-term sustainability within the health system. Speech Pathology Australia endorses recommendations to enable workforce planning, growth, flexibility and innovation. **Future workforce planning and funding initiatives must include all health professionals** regardless of whether they are registered, partially registered or self regulating professions.

Speech Pathology Australia supports the clinical training initiatives, including the Increased Clinical Training Capacity and Innovative Clinical Teaching and Training Grants. These programs and the Clinical Training subsidies **must not be restricted to registered professions only**, but need to be available to support clinical education of all health professions which provide undergraduate clinical placements.



A modern workforce must have **defined scopes of practice based on competence and expertise**. There is opportunity for **extended scopes of practice** for speech pathologists with examples including: direct specialist referrals, limited prescription rights and extended practice areas of diagnostics and intervention e.g. endoscopy and oral and tracheal suctioning.

Speech Pathology Australia continues to support a competency framework evidenced through the profession's 'Competency Based Occupational Standards (CBOS)'. This competency framework is applied to entry level standards for speech pathologists seeking 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 supports the notion of interdisciplinary learning, education and practice; however this **should not compromise profession-specific competencies and training**.

In summary, Speech Pathology Australia provides its overall support for many of the proposed health reforms. Critical to the success of such reforms is equal engagement of the allied health professions, in addition to medicine and nursing. Allied Health, including the speech pathology profession, must be involved in the governance and planning phases of reform as well as being central at all levels of health service delivery. It is paramount that there is adequate funding and resourcing made available so that consumers can access adequate and timely services to meet their health needs. The Health Workforce, comprising all health professions, must be supported to meet the current and future health service demands.

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23 December 2009

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