



AUSTRALIAN MEDICAL
ASSOCIATION

ABN 37 008 426 793

T | 61 2 6270 5400

F | 61 2 6270 5499

E | info@ama.com.au

W | www.ama.com.au

42 Macquarie St Barton ACT 2600

PO Box 6090 Kingston ACT 2604

AMA submission to the Australian Commission on Safety and Quality in Health Care - Feedback on draft National Safety and Quality Primary Healthcare Standards

accreditation@safetyandquality.gov.au

Introduction

The AMA welcomes the opportunity to provide feedback on the draft National Safety and Quality Primary Healthcare (NSQPH) Standards. The AMA appreciates the Commission's efforts over the last few years and the consultations undertaken to get to this point. In providing feedback we will provide some general comments and then address each of the areas for feedback requested via the consultation.

General comments

In general, the AMA is satisfied that these draft NSQPH Standards provide a realistic framework in which to assist primary healthcare services, such as independent allied health providers, to minimise the risk of harm and to improve care for patients. However, the Commission needs to make it abundantly clear that these NSQPH Standards are not intended to encompass general practice. The definition of what is primary healthcare and a primary healthcare service needs to be reframed from its current general nature so it is specific to the services and providers the NSQPH Standards are intended to apply to. The definition needs to clearly exclude general practice on the basis that existing profession led standards are in place.

The AMA is pleased to see feedback from our January 2018 submission being reflected within these NSQPH Standards, which will help ensure their robustness.

Comments on the Introduction

Given that many services within the primary healthcare sector are independent and private operators the AMA supports the voluntary nature of the NSQPH Standards.

The AMA acknowledges that there is an alignment of these Standards with existing profession-specific standards. However, the AMA is strongly opposed to the NSQPH Standards being

portrayed or seen as an alternative to profession-specific standards where they exist and under which primary healthcare providers may currently be accredited.

Profession-specific standards, such as the RACGP's Standards for General Practices, are "developed with the purpose of protecting patients from harm by improving the quality and safety of health services¹" and are "based on the best available evidence of how general practices can provide safe and quality healthcare to their patients²." No accreditation standard less than this should be acceptable for general practices.

Similarly, non-accredited general practices should not be given any expectation that they could be accredited under a different set of standards. This would risk undermining established profession-specific standards, encouraging niche practice, reducing access to general care, increasing the cost of healthcare and lead to confusion among patients about the meaning and value of practice accreditation.

To address these concerns the Commission needs to:

- Retitle "What is a primary health care service" to "What is a primary health care service these Standards apply to" and reword this section to exclude professions subject to profession-specific standards;
- Under the heading "Who should implement the National Safety and Quality Primary Healthcare Standards?" on page 6:
 - strongly encourage primary healthcare services in Australia not subject to profession-specific standards to implement them;
 - delete the words "or where primary healthcare services are ineligible to be assessed against relevant profession-specific standards" as this creates an opportunity to circumvent profession-specific standards, receive validation for doing so and potentially be eligible for some form of government funding; and
- Under the section titled "Alignment with other standards" at page 8, include a clarifying statement to the effect that the NSQPH standards are not intended to be a substitute standard for any applicable profession-specific standard. It should also be clearly stated that implementation of the NSQPH standards may be a requirement for funding primary healthcare providers for whom there are no applicable profession-specific standards.

The AMA is also concerned at the impact these new standards will have on primary healthcare services, which as mentioned in the consultation paper, may already be subject to a range of quality improvement standards. This is not only administratively burdensome in an already highly regulated environment but also adds unnecessarily to the costs of business and service provision.

¹ The Royal Australian College of General Practitioners. Standards for general practices. 5th edn. East Melbourne, Vic: RACGP, 2020, p 1

² Ibid, p 4

Comments on the appropriateness of the NSQPH standards

Overall, the Commission has taken a sensible approach to the NSQPH standards recognising and providing for the diversity of primary health care services while also ensuring the fundamentals are in place for the provision of safe and quality care.

The AMA commends the Commission for acknowledging the circumstances in which certain standards are/are not applicable. This ensures that the NSQPH standards, where no other standards prevail, can encompass the breadth of services provided within the primary healthcare sector, retain their relevance and are realistic for those services who wish to participate.

Comments on the Actions

The AMA is supportive of the actions outlined under the NSQPH Standards as they underpin the processes necessary for the delivery of safe and quality care. Nonetheless, it should be noted that the explanatory note for Action 2.05 may not always be achievable, despite its worthy intent. There are some patients who are severely intellectually disabled or have advanced dementia, for example, who may permanently rely on a substitute decision maker to look after their health care decisions.

Comments on the Language

Aside from where the NSQPH Standards currently fail to articulate applicability the language is generally easy to understand, clearly explains the intention of each standard and the purpose behind the inclusion of the key criteria and the actions required to comply.

Comments on Not applicable actions

The table of not applicable actions clearly identifies what actions are required without exclusion and the circumstances where exclusions are warranted. The AMA has no suggested inclusions to the primary healthcare services listed in this table.

Evaluation of Standards and Use

The AMA recommends that the standards are routinely evaluated to assess their ongoing relevance, take-up and overall impact on the safety and quality of non-general practice primary healthcare in Australia.

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Contact

Michelle Grybaitis
Senior Policy Advisor

Policy Department
Ph: (02) 62705496
mgrybaitis@ama.com.au