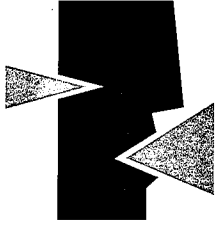
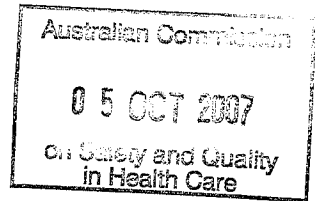


Speech Pathology Australia



Giving people a say in life



Adj. Professor Margaret Banks
Policy Team Manager
Australian Commission on Safety and Quality in Health Care
GPO Box 5480
Sydney NSW 2001

28 September 2007

Dear Professor Banks,

**Re: Submission – Phase 2
National Safety and Quality Accreditation Standards**

Speech Pathology Australia has pleasure in submitting its response to the second phase of the Commission's consultation paper, "An alternative model for safety and quality accreditation on health care".

In principle, Speech Pathology Australia supports the Commission's charter in seeking the best possible model to implement safety and quality accreditation of health care.

Speech Pathology Australia highlights the following points for the Commission's consideration:

1. Speech Pathology Australia welcomes the separation of safety assurance and quality improvement assessment process. It is imperative that the process is given the best opportunity to complete an environmental analysis and, therefore, provide suitable standards appropriate to each health sector. Speech Pathology Australia recommends that the Commission approach and consult each profession individually in order to gain a better understanding of the implications and impact that safety and quality accreditation would have on each industry;
2. For the Commission to take into consideration that Speech Pathology Australia is currently reviewing its position on becoming a registered profession. Speech Pathology Australia supports the Commission's approach to implement quality improvements through stages. Given that our profession is investigating the suitability and implications of registration, it would be of benefit if quality improvements could be introduced through stages, so as to minimise the impact of multiple change on a relatively small profession;

The Speech Pathology Association of Australia Limited
2nd floor, 11-19 Bank Place Melbourne VIC 3000
Phone: 03 9642 4899 Fax: 03 9642 4922

Email: office@speechpathologyaustralia.org.au Website: www.speechpathologyaustralia.org.au

ABN 17 008 393 440

3. Speech Pathology Australia acknowledges the Commission's response to seek further consultation with key stakeholders regarding unannounced surveys. Speech Pathology Australia wishes to emphasise its position that unannounced surveys be changed to 'limited notification' of accreditation surveys. The Commission's approach in piloting this process is welcomed;
4. It remains unclear as to how the suggested alternative model will incorporate the legislative changes to private health insurance. It would be appreciated if the Commission could address this in the next consultation paper;
5. Given the working nature of speech pathologists, the financial costs, human resources and time allocated to meeting accreditation standards will be prohibitive to practitioners operating as a sole practitioner or within a small practice (whether it is public or private). Speech Pathology Australia suggests that should accreditation proceed, then an arrangement similar to the Federal Government's initiative with General Practitioners should be considered. That is, speech pathologists should receive funding from the Federal Government to aide the development of standards within their practice and for the conduct and management of the accreditation process. Such funding will assist in the cost of conducting audits, preparation time, and implementation of any recommendations. We request that project funding for Speech Pathology Australia itself be considered in order to establish profession specific standards and quality improvement guidelines;
6. Speech Pathology Australia wishes to emphasise that different levels of accreditation should be considered across disciplines and within disciplines – "one size won't fit all". Certain standards (i.e. hospital-based infection control standards) may be vital for some speech pathologists who work with instrumentation (i.e. swallowing and voice) diagnostic procedures. However, other speech pathology services may not be required to meet the same degree or level of standards. Minimum standards need to be applicable across different healthcare disciplines and settings and be distinguished from profession-specific standards;
7. That standards are not set according to technical competency of practitioners, rather standards should focus on safety and quality for improved patient outcomes. In principle, Speech Pathology Australia supports the setting of minimum safety standards, however, each minimum standard needs to be appropriate to all health practitioners across all health sectors;
8. That the Commission take into consideration those speech pathologists who are not working in a traditional "health care" setting. Many speech pathologists work within an educational and early intervention model. Given the general scope of practice of speech pathologists, such practitioners provide "health care" services within the framework of different organisational structures and service delivery models;
9. The establishment of a national body to lead and coordinate change will be necessary for the successful implementation of these changes. It is recommended that such a national body directly consult with industry/professional associations in order to communicate changes to their wider memberships. Speech Pathology Australia recommends a collaborative approach where professional associations (i.e. Speech Pathology Australia) are given a lead role in the education and dissemination of information to their broader membership.

As Speech Pathology Australia is currently debating the idea of national registration, it is advisable that safety and quality accreditation of health care be implemented after 2010. This will allow time for our profession to establish the right structures prior to minimum safety and quality accreditation being enforced.

On behalf of Speech Pathology Australia, I look forward to continued dialogue with the Commission in seeking the best possible model for safety and quality accreditation of health care for our profession. Should you wish to discuss this submission, then please contact me or our Advisor, Private Practice, Tristan Nickless on 03 642 4922.

Yours sincerely,



Gail Mulcair
Chief Executive Officer