



18 March 2010

Draft Regulations for the healthcare Identifiers Service
eHealth Branch
Primary and Ambulatory Care Division (MDP1003)
Department of Health and Ageing
GPO Box 9848
Canberra ACT 2601

Consultation on Health care Identifiers Regulations 2010

To Whom It May Concern,

The Dietitians Association of Australia (DAA) thanks the Australian Health Ministers' Advisory Council for the invitation to provide feedback on the drafted healthcare identifier regulations as a stakeholder. We believe it crucial that the regulations prescribe the classes of healthcare providers who can be assigned identifiers is accurate. The current draft requires a change in wording.

The DAA is concerned that the drafted regulations do not adequately identify the appropriate health professionals as 'health care providers –individuals'. Since dietetics is not a regulated profession we strongly believe that Accredited Practising Dietitians are the eligible group to obtain individual healthcare identifiers. Currently the APD credential is the requirement used by Medicare and DVA to recognise appropriate providers of nutrition and dietetics services.

The draft regulations use the word 'membership' in reference to individuals of professional associations eligible for individual healthcare identifiers. It would be potentially dangerous to public safety and the health system's reputation with this loose terminology. Further detail on appropriate classes of membership is required.

Technically not all members of a professional association are practising health professionals. There are student, retired, associate and honorary members of the DAA who do not practise dietetics and are not qualified to do so. Also, not all members participate in continuing professional development.

Accredited Practising Dietitians (APDs) are the health care professionals who are qualified (and recognised by the APD credential) to provide dietetics services. APDs participate in the DAA's continuing professional development program, known as the



‘APD program’. The DAA also awards the ‘Accredited Nutritionist’ credential to eligible persons. Accredited Nutritionists who are not also Accredited Practising Dietitians are not qualified to practice medical nutrition therapy (dietetics) and would therefore not be eligible for an individual health care provider identifier.

The DAA suggests the following wording to identify individuals requiring prescribed individual health care identifiers who are not registered by a registration authority:

“ that individual health care providers are of an appropriate class of membership or awarded a credential as determined by the professional association.”

Yours sincerely,

A handwritten signature in black ink, reading 'Claire Hewat'. The signature is written in a cursive style with a large, sweeping initial 'C'.

Claire Hewat APD AN
Chief Executive Officer