



**30 June 2010**

**Submission from the Dietitians Association of Australia  
to the National Quality Framework Project Team**

**Revision of the National Standards for Disability Services**

The Dietitians Association of Australia (DAA) is the peak body and national association of the dietetic profession with over 4200 individual members. DAA supports a nutrition and disability interest group with 344 members who are passionate about advocating for better nutrition and dietetic services for people with disabilities. DAA is the leader in nutrition and advocates for better food, better health, and better living for all.

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**Introduction**

The Dietitians Association of Australia (DAA) thanks the Australian, State and Territory governments undertaking the revision of the National Quality Framework for Disability Services in Australia, for the opportunity to provide comments as part of the consultation process. DAA welcomes the revision of the National Standards for Disability Services.

DAA is interested in improving the existing healthcare system to better manage and provide services for Australians with disabilities. We contend that the current system does not adequately manage the nutrition needs of people with disabilities.

DAA is concerned about the neglect in dietetic services for people with disabilities. There is great disparity across Australia government support to supply adequate nutrition services to people with disabilities. DAA contends that nutritional health is a fundamental part of health and well-being and a basic human right<sup>1</sup>.

Four key recommendations have been raised by DAA with Australian, State and Territory governments regarding the disability reform agenda over the last 12 months:

1. That an adequate, equitable and nationally consistent approach be taken to nutrition and dietetic services provided to Australians with disabilities. Nutrition should after all be regarded as an integral part of health and well-being in a holistic evaluation of health.
2. That wherever speech pathologists are employed under a Disability Services Program (paediatric or adult), to assess clients with eating and drinking problems, there is also an Accredited Practising Dietitian (APD) employed to ensure optimal nutritional health. The two professions should work collaboratively to achieve dietary adequacy as well as safety in the food for these very vulnerable clients.
3. That a national project is established to define 'therapy' services under the Disability Services Program for children with developmental disabilities. DAA contends that the definitions should be outcomes-based and promote best practice in all allied health services provided to these children.
4. That a periodic planning process be required of all States and Territory governments administering disability services. The planning process should include broad-based consultation with services and the community in a similar model to that required for the Home and Community Care (HACC) Program.

### **National Standards**

DAA is pleased to see an emphasis on evidence based approaches as part of the Quality Framework. DAA supports the existing national standards, particularly standards 1,2 and 8 and provides some comments below. An additional standard regarding the protection of human rights and freedom from abuse is supported by DAA, in line with some jurisdictions' existing standards.

Standard 1, regarding access, has relevance to dietitians. Access to high quality dietetic services is not consistent across Australia. People with disabilities should be able to access nutrition services in a timely manner from APDs.

DAA supports the approach to providing services based on individual needs (Standard 2). APDs are qualified nutrition and dietetic professionals trained to provide tailored medical nutrition therapy for individuals and their families. To meet the individual needs of people, APDs will also need to work at a systemic level, for example, via influencing and /or managing food service systems.

DAA supports the service management standard (Standard 8). Supporting Standard 8.1 highlights the legal and human rights of people with a disability. DAA asserts that nutritional health is a fundamental part of health and well-being and a basic human right<sup>1</sup>. This standard also covers the provision of a safe physical environment which DAA interprets to include food safety and the provision of appropriate modified texture foods and fluids for those individuals with dysphagia.

DAA also support standard 8.6 regarding services be provided by appropriately skilled and competent staff. APDs are best placed to provide appropriate evidence based nutrition knowledge, information and advice.

DAA supports the addition of a national standard regarding the 'protection of human rights and freedom from abuse'. It appears that most states and territories have endorsed a standard on this issue.. The NSW Ageing and Disability Department 'Standards in

Action'<sup>2</sup> provides detail on 'nutrition and health' as part of that State's standards document. DAA supports the inclusion of specific nutrition guidelines to support the national standards. It is important to ensure all disability service users are supported to achieve healthy lifestyles, and this includes:

- regular nutrition screening,
- weight and health monitoring,
- access to APDs for individualised assessment and intervention where appropriate,
- written nutrition policies for service providers,
- development and regular review of service provider menus by APDs, where relevant,
- appropriate training and education of service provider staff regarding nutrition issues, eg. Food allergy management, nutrition screening, special diet/ feeding delivery and food handling.

## References

1. DAA submission to the National Human Rights Consultation. June 2009. Available at <http://www.daa.asn.au/index.asp?pageID=2145870837> [Accessed 29 June 2010].
2. NSW Ageing & Disability Department. Standards in Action: Practice Requirements and Guidelines for Services Funded Under the Disability Services Act. May 1998.

## About Accredited Practising Dietitians

Accredited Practising Dietitians (APDs) are recognised professionals with the qualifications and skills to provide expert nutrition and dietary advice. APDs are qualified to advise individuals and groups on nutrition related matters using medical nutrition therapy. They also have clinical training to modify diets to treat conditions such as diabetes, heart disease, cancers, gastro-intestinal diseases, food allergies and intolerances and overweight and obesity.

APDs have sound university qualifications accredited by DAA, undertake ongoing professional development and comply with evidence based practice. They are committed to the DAA *Code of Professional Conduct* and *Statement of Ethical Practice*, and to providing quality service.

APD is the only national credential recognised by the Australian Government, Medicare, the Department of Veterans Affairs and most private health funds as the quality standard for nutrition and dietetics services in Australia. It is a recognised trademark protected by law.