



Expanding access to Accredited Practising Dietitians under Medicare

January 2018

The Dietitians Association of Australia (DAA) is the national association of the dietetic profession with over 6000 members, and branches in each state and territory. DAA is a leader in nutrition and advocates for food and nutrition for healthier people and healthier nations. DAA appreciates the invitation from the Australian Government Treasury to make recommendations on priorities for the 2018-19 Budget.

DAA interest in this consultation

As the peak body for the dietetic profession, DAA advocates for access to the services of Accredited Practising Dietitians (APDs) to support Australians in self-care, to modify lifestyle behaviours and to address risk factors for disease.

The APD Program is the basis for self-regulation of the dietetic profession and provides an assurance of safety and quality. The APD credential is required for registration as a Medicare provider for allied health Chronic Disease Management items.

Recommendations

1. A new Medicare items should be introduced for people with mental illness, such as eating disorders, depression, anxiety or schizophrenia to consult APDs to manage physical and mental health on referral from a psychiatrist or general practitioner.
2. Rural Australians with chronic medical conditions such as diabetes, cardiovascular disease, stroke, cancer or musculoskeletal conditions managed by a General Practitioner (GP) under the Medicare Chronic Disease Management items would have better quality of life and cost the health system less by extending provisions under the Medical Benefit Schedule (MBS) to permit telehealth services as an alternative to face to face services by allied health practitioners, such as APDs under MBS Dietetics Item 10954.
3. Better outcomes for Australians with chronic medical disease would be achieved by better access to allied health practitioners, including APDs, to support self-management under the Medicare Chronic Disease Management items by
 - increasing the limit of five services per annum in total for allied health to 10 services per annum
 - introducing new items to allow for long consultations.
4. The quality of care for Australians with chronic disease would be improved by introducing case conferencing as an additional item for allied health practitioners under the MBS as an incentive for participation in multidisciplinary case conferencing, as GPs are compensated for this important activity under items 735 - 758 in the Medicare Benefits Schedule.

Background to recommendations to expand access to APDs under the MBS

Introduction

Individuals with chronic disease experience better outcomes when they have access to primary health care provided by a multidisciplinary team, including a GP and one or more allied health practitioners¹⁻⁴. Better access to allied health interventions for those most at risk but least able to self-fund care would provide savings to the government by avoiding or delaying treatment needed for comorbidities.

Currently there is a limit of five services rebated annually under the MBS for allied health (including APDs), rebates are based on 20 minute (short) consultations, services must be delivered face to face and there is no incentive to participate in multidisciplinary case conferencing. Also, APDs are not eligible for Better Mental Health items.

New MBS item for dietitians to treat mental illness

- New MBS items are needed for APDs to treat physical and mental health as an adjunct to medical interventions for mental illness.
- People with serious mental illness experience considerable morbidity, loss of quality of life and a lower life expectancy of 20 or more years⁵. They also have far greater incidence of chronic disease, with 90% experiencing physical illness⁶. This costs individuals and their families, and impacts on the government bottom line.
- Recent Australian studies show that diet is a highly effective treatment for symptom reduction and remission of mental illness, as well as improving physical health parameters⁷⁻¹¹.
- Funded positions for dietitians in public hospitals and community services are not sufficient to meet community needs. Small numbers of people choose to self-fund dietetic care or use their private health insurance to consult APDs in private practice. Medicare Chronic Disease Management items offer limited access because the five items available per year are shared across all eligible allied health providers. This is not enough to meet the complex needs of people with mental illness who require more and longer consultations with APDs to be clinically effective.
- Introducing MBS items for APDs for individual and group consultations would improve equity of access to nutrition services for people with mental illness

who are most at risk of poor diet and mental illness but may have the least capacity to pay for private services.

Telehealth

- Australians living in rural and remote areas have poorer health outcomes than their metropolitan counterparts¹² and yet they have less access to allied health services to support self-management of their chronic medical conditions¹³ such as diabetes, kidney disease, gastrointestinal disease or food intolerance.
- DAA records indicate 20% of APDs practice in regional, rural or remote areas, but not all geographical areas are covered. Even where APDs do offer a service, patients may not be able to afford private practice fees. There is evidence that out-of-pocket-costs can influence patient decisions about when they access health care¹⁴. In some cases, the patient may have specialised needs for complex nutrition care which is not within scope of the local APD.
- The Australian Department of Health states that specialist video consultations under Medicare ‘provide many patients with easier access to specialists, without the time and expense involved in travelling to major cities’. 47,883 patients benefited from 120,005 services claimed by 8,823 medical specialist, general practitioners, midwives and nurse practitioners between July 2011 and December 2013¹⁵. Allowing telehealth consultations for allied health consultations would be consistent with a human rights approach and more equitable than the status quo.
- Dietetic services are well suited to the medium of telehealth, as demonstrated by the inclusion of telehealth in the pilot of the Coordinated Care for Diabetes reform. There is evidence that telephone counselling by a dietitian achieves dietary behaviour change^{16,17} and improves metabolic parameters in individuals with metabolic syndrome¹⁸.
- An Australian review of allied health video consultation services found clinical outcomes have generally been similar to outcomes of face-to-face consultations, with relatively high levels of patient satisfaction¹⁹. A US study found programs delivered by telephone had a lower cost but similar outcomes compared with face to face format²⁰.
- The utility of telehealth is recognised by private health funds offering telephone and online health services to members²¹.
- The 2010 Telehealth for Aged Care report²² concluded that older Australians participating in telehealth may delay entry to residential aged care.

Increase in number of allied health services

- In the 2013 – 2014 financial year, there were 324,403 consultations attracting a benefit of \$17,339,797 reported for MBS Dietetics item 10954 for patients with a chronic medical condition and complex care needs. This is a small investment against the health expenditure of \$22.3 billion in 2000 – 2001, and the potential benefits²³. The Primary Health Care Advisory Group Final Report *Better Outcomes for People with Chronic and Complex Health Conditions* report noted that allied health services represent only 7.7% of services funded through Chronic Disease Management items²⁴.
- Effective nutrition counselling in diabetes requires sufficient consultations to introduce and reinforce complex concepts for ongoing self-management. This was demonstrated in recent Australian trials for nutrition interventions which included seven consultations to achieve improvements in depression ²⁵.
- A number of organisations have expressed support for an increase in the number of allied health services under the MBS. This includes Diabetes Australia, the Chronic Disease Alliance, Allied Health Professions Australia, and the Australian Medical Association.
- Diabetes Australia identified that 10 services are needed to achieve acceptable outcomes in Type 1 diabetes²⁶.
- The Diabetes Care Project demonstrated that the limit of five allied health services is not adequate to meet the needs of people. Greater investment in allied health resulted in better outcomes measured by HbA1c, systolic blood pressure, total cholesterol, LDL, waist circumference and depression. The limited consultations currently allowed poses a barrier to change in lifestyle management.

Introduce long consultations

- The majority of Better Access items for allied health to treat mental health are long consultations consistent with the complex nature of treating mental health, the time needed to build a relationship between patient and professional, and the time needed to counsel effectively. Medical nutrition therapy would be delivered by APDs using counselling approaches, not dissimilar to other interventions delivered under Better Access items by other allied health professionals.

Case conferencing

- The quality of patient care is currently compromised by the lack of compensation for allied health practitioners to contribute to case conferencing.

- Multidisciplinary case conferencing has the potential to improve the effectiveness of health care and reduce hospital admissions²⁷.
- Although GPs have incentives through Medicare items 735 - 758 to participate, they do not do so because others in the health care team are not compensated to attend conferences.

Cost of recommendations

New MBS item for dietitians to treat mental illness

As an example using depressive disorders, improving symptoms has the potential to reduce admissions to hospital and shorten length of stay, and to reduce absenteeism and presenteeism. The benefits in financial terms in the context of the estimated cost of medical nutrition therapy of a mean seven sessions of \$1318.05 could be exceeded by possible cost savings under plausible assumptions, given the high cost to the health sector and the economy of major depression:

- Depressive episode is the most commonly reported principal diagnosis for separations with specialised psychiatric care (17.4%) in Australian public hospitals²⁸. The median cost per bed day is \$1424²⁹. In 2014-15 the average length of stay for mental health related patients in public acute hospitals was 15.7 days³⁰.
- In terms of productivity, it is estimated that an additional six days of absenteeism can be related to a moderate severity mental health condition, i.e. more than one working week. In May 2016 the Full-Time Adult Average Weekly Ordinary Time Earnings were \$1,516.00^{31,32}.

Telehealth

- Substituting telehealth services for standard consultations covered by Medicare Item 10950 would be cost neutral for the consultation. Advice from the Department of Health is that patients accessing Chronic Disease Management items attend an average 2.5 allied health items per year. Demand from people wishing to access services by telehealth is likely to be modest, and very unlikely to approach the current limit of five items per year.
- Improved outcomes would reduce expenditure on medications and decrease hospital costs as demonstrated by the pilot of the Diabetes Care Project.
- There would be a requirement to update Department of Health and Department of Human Services processes and information related to Medicare.

Overall increase in consultations

- An increase in the number of consultations for allied health would require an increase in the health budget but more sophisticated analysis of the current pattern of usage of Chronic Disease Management items would allow modelling of potential changes in usage
- Greater investment in allied health interventions would be expected to improve health outcomes³³, reduce acute care costs, improve productivity through reduced absenteeism and reduced disability, to achieve cost savings in the longer term.

Introduction of case conference item for allied health

- This initiative would require an increase in the health budget as allied health practitioners would have an incentive to participate in multidisciplinary care
- This initiative also has the potential to save healthcare dollars by reducing hospital admissions and morbidity³³ associated with chronic disease.

Relationship to government policy

These recommendations are consistent with the Coalition government commitment to delivering a 'fair go' for regional Australia to ensure that they receive their 'fair share' of support from government on a wide range of policy programmes³⁴.

The recommendations are also consistent with the funding of a Centre for Research Excellence in Telehealth³⁵, and the objectives of the National Diabetes Strategy³⁶.

References

1. de Sonnaville JJ, Bouma M, Colly LP, et al. Sustained good glycaemic control in NIDDM patients by implementation of structured care in general practice: 2-year follow-up study. *Diabetologia* 1997; 40: 1334-1340
2. Wagner EH. Chronic disease management: what will it take to improve care for chronic illness? *Eff Clin Pract* 1998; 1: 2-4
3. Renders CM, Valk GD, Griffin SJ, et al. Interventions to improve the management of diabetes in primary care, outpatient, and community settings: a systematic review. *Diabetes Care* 2001; 24: 1821-1833
4. Mitchell GK, Tieman JJ, Shelby-James TM. Multidisciplinary care planning and teamwork in primary care. *MJA* 2008; 188: S61-S64

5. , <http://www.ox.ac.uk/news/2014-05-23-many-mental-illnesses-reduce-life-expectancy-more-heavy-smoking>
6. Australian Bureau of Statistics, National Health Survey: Mental Health and co-existing physical health conditions, Australia, 2014 – 15, ABS 2015; cat no 4329.0.00.004
7. Zarnowiecki D et al. A 6-month randomised controlled trial investigating effects of Mediterranean-style diet and fish oil supplementation on dietary behaviour change, mental and cardiometabolic health and health-related quality of life in adults with depression (HELFIMED): Study protocol. *BMC Nutr* 2016;2:52:DOI:10.1186/s40795-016-0095-1.*
8. O'Neil A, Berk M, Itsiopoulos C, et al. A randomised, controlled trial of a dietary intervention for adults with major depression (the "SMILES" trial): study protocol. *BMC Psychiatry* 2013;13 doi:10.1186/1471-244X-13-114):114*
9. Jacka F, O'Neil A, Itsiopoulos C, Opie R, et al A randomised controlled trial of dietary improvement for adults with major depression (the 'SMILES' trial), *BMC Med* (2017) 15:23.
10. Parletta N, et al, A Mediterranean-style dietary intervention supplemented with fish oil improves diet and mental health in people with depression: a 6-month randomised control trial (HELFIEMD), under review *BMC Medicine*, January 2017
11. Teasdale S et al. A nutrition intervention is effective in improving dietary components linked to cardiometabolic risk in youth with first-episode psychosis. *Br J Nutr* 2016; 115: 1987-93
12. National Health Reform Progress and Delivery September 2011. <http://www.yourhealth.gov.au/internet/yourhealth/publishing.nsf/Content/nhr-progress-delivery#.UPd4LPJpOqY> Accessed 17 January 2013
13. Harris MF, Jayasinghe UW, Taggart JR, Christl B, Proudfoot JG, Crookes PA, Beilby JJ, Powell Davies G. Multidisciplinary Team Care Arrangements in the management of patients with chronic disease in Australian general practice. *MJA* 2011; 194: 236 – 239
14. Kiil A, Houlberg K. How does copayment for health care services affect demand, health and redistribution? A systematic review of the empirical evidence from 1990 to 2011. *Eur J Health Econ* 2014; 15: 813. <https://doi.org/10.1007/s10198-013-0526-8>
15. Telehealth Statistics [http://www.mbsonline.gov.au/internet/mbsonline/publishing.nsf/Content/36ACE7F284A16656CA257A06001B7437/\\$File/How%20to%20generate%20Medicare%20Statistics%20for%20MBS%20Telehealth%20items.pdf](http://www.mbsonline.gov.au/internet/mbsonline/publishing.nsf/Content/36ACE7F284A16656CA257A06001B7437/$File/How%20to%20generate%20Medicare%20Statistics%20for%20MBS%20Telehealth%20items.pdf) Accessed 31 January 2015
16. Eakin EG, Lawler SP, Vandelanotte C, Owen N. Telephone interventions for physical activity and dietary behavior change. *Am J Prev Med* 2007; 32: 419-434

17. Dennis SM, Harris M, Lloyd J Powell Davies G, Faruqi N, Zwar N. Do people with existing chronic conditions benefit from telephone coaching? A rapid review. *Aust Health Review* 2013; 37: 381 - 388
18. Fappa E, Yannakoulia M, Ioannidou M, Skoumas Y, Pitsavos C, Stefanadis C. Telephone counseling intervention improves dietary habits and metabolic parameters of patients with the metabolic syndrome: a randomized controlled trial. *Rev Diabet Stud.* 2012 Spring;9(1):36-45. doi: 10.1900/RDS.2012.9.36. Epub 2012 May 10. Abstract available from: <http://www.ncbi.nlm.nih.gov/pubmed/22972443>
19. Raven M, Bywood P. Allied health video consultation services. PHC RIS Policy Issue Review. Adelaide. Primary Health Care Research & Information Service. 2013
20. Radcliff T, Bobroff LB, Lutes LD, Durning PE, Daniels MJ, Limacher MC, Janicke DM, Martin D, Perri MG. Comparing costs of telephone vs face-to-face extended-care programs for the management of obesity in rural settings. *J Acad Nutr Diet* 2012; 112: 1363-1373
21. Innovative telehealth solutions. <https://www.medibankhealth.com.au/telehealth> Accessed 5 February 2015
22. Pezzullo L, Mitchell S, Brown H. Telehealth for aged care. *Access Economics* 2010. http://www.dbcde.gov.au/__data/assets/pdf_file/0014/131900/Telehealth-for-aged-care.pdf Accessed 31 January 2012
23. 1301.0 - Year Book Australia, 2008 <http://www.abs.gov.au/ausstats/abs@.nsf/0/895A3D95B6ACAE9CCA2573D200107617?opendocument> Accessed 5 February 2015
24. PHIA, Private Health Insurance Australia Quarterly Statistics March 2015, P.H.I.A. Council, Editor 2015.
25. Parletta N et al. A Mediterranean-style dietary intervention supplemented with fish oil improves diet quality and mental health in people with depression: A randomized controlled trial (HELFI-MED). *Nutr Neuroscience* 2017 DOI: 10.1080/1028415X.2017.1411320
26. National Policy Priorities. *Diabetes Australia* 2010 <http://www.diabetesaustralia.com.au/Documents/DA/Policy%20Advocacy/National%20Policy%20Priorities%202010%20-%20updated%20August%202012.pdf> Accessed 22 January 2013
27. Abernethy AP et al. Delivery Strategies to Optimize Resource Utilization and Performance Status for Patients with Advanced Life-Limiting Illness: Results From the "Palliative Care Trial" *J Pain Symptom Manage* 2012. <http://www.jpmsjournal.com/article/S0885-3924%2812%2900274-6/abstract> Accessed 22 January 2012
28. Australian Institute of Health and Welfare (AIHW). *Australia's Health* 2014. Section 4.8 Mental Health In Australia. Canberra: AIHW. 2014. URL: <http://www.aihw.gov.au/WorkArea/DownloadAsset.aspx?id=60129548150>. (accessed 12/12/2016)

29. Independent Hospital Pricing Authority (IHPA). Mental Health Costing Study. Sydney: IHPA. January 2016. URL: https://www.ihpa.gov.au/sites/g/files/net636/f/publications/mental_health_costing_study.pdf (accessed 12/12/16)
30. Australian Institute of Health and Welfare (AIHW). Admitted patient care 2014-15: Australian hospital statistics. Health services series no 68. Cat. No. HSE 172. Canberra: AIHW. 2016. URL: <http://www.aihw.gov.au/publication-detail/?id=60129554702> (accessed 13/12/16)
31. Pricewaterhouse Coopers (PwC). Creating a mentally healthy workplace. Return on investment analysis. Canberra: National Mental Health Commission. 2014. URL: <https://www.headsup.org.au/docs/defaultsource/resources/bl1269-brochure---pwc-roi-analysis.pdf?sfvrsn=6> (accessed 13/12/16).
32. Australian Bureau of Statistics (ABS). 6302.0 - Average Weekly Earnings, Australia, Canberra: ABS. 2016. URL: <http://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/6302.0Main+Features1May%202016?OpenDocument#> (accessed 13/12/16)
33. The Diabetes Control and Complications Trial Group. The effect of intensive treatment of diabetes on the development and progression of long-term complications in insulin-dependent diabetes mellitus. NEJM 1993; 329: 977 – 986 <http://www.nejm.org/doi/pdf/10.1056/NEJM199309303291401> Accessed 22 January 2012
34. Liberal Party of Australia. Real Solutions for all Australians. Melbourne. Bamba Press 2013
35. Research to Improve Access to Health Services for Regional and Rural Australians. <http://www.health.gov.au/internet/ministers/publishing.nsf/Content/health-mediarel-yr2014-dutton073.htm> Accessed 5 February 2015
36. Terms of Reference - National Diabetes Strategy Advisory Group <http://www.health.gov.au/internet/main/publishing.nsf/Content/ndsag-tor> Accessed 5 February 2015