10 October 2014

Mr Kim Snowball
Independent Reviewer
National Registration and Accreditation Scheme
for Healthcare Professions (NRAS) Review

Dear Mr Snowball,

**NEHTA Submission the NRAS Review Consultation Paper**

The National E-Health Transition Authority (NEHTA) refers to its first-stage submission to the National Registration and Accreditation Scheme for Healthcare Professions Review (NRAS Review) and welcomes the opportunity to provide further submissions in response to the NRAS Review Consultation Paper dated August 2014. These submissions are based on issues we have identified as part of NEHTA’s scope of work, including our role assisting our stakeholders to make full use of the eHealth systems in Australia.

**Submissions**

NEHTA’s submissions relate to the following key areas:-

1. Other Professions seeking entry to the National Scheme,

2. AHPRA’s role in accommodating education and training to registered healthcare professionals to address changes in technology as it relates to eHealth, and

3. The Healthcare Identifiers Act and Service Review and its recommendations in relation to role of AHPRA in Australian eHealth programs.

**Professions seeking entry to the National Scheme**

Part 1 of the Consultation Paper contains a discussion about other health practitioner groups seeking to join the National Scheme and poses the question:

7. Should the National Law be amended to recognise those professions that provide adequate public protection through other regulatory means?

As a national registration authority, AHPRA is authorised under s9(2) of the Healthcare Identifiers Act 2010 to assign unique healthcare provider identifiers for individuals (HPI-1s), if the individual is a member of a health profession governed by AHPRA. Other healthcare providers who are eligible\(^1\) for a HPI-I but not regulated by AHPRA apply directly to the HI Service for the assignment of their HPI-I.

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\(^1\) Other healthcare providers are eligible for a HPI-I if they are ‘a member of a professional association that has uniform national membership requirements, whether or not in legislation (Section 9A(2) of the Healthcare Identifiers Act 2010)’.
In 2013, a formal review of the HI Service\(^2\) was conducted (as required under the *Healthcare Identifiers Act 2010*) and the following recommendation was made in relation to the registration of healthcare provider individuals with a view to further improving and streamlining the overall interaction between AHPRA and the HI Service.

**Recommendation 10 – Assignment of Provider HPI-Is**

It is recommended that AHMAC consider transitioning all provider Healthcare Identifier (HPI-I) registration functions to AHPRA to standardise and streamline provider registration and associated information management processes.

In NEHTA’s view, amending the National Law to recognise those professions that provide adequate public protection through other regulatory means would capture a number of healthcare providers who are eligible for an HPI-I but not currently regulated by AHPRA.

As a result, healthcare provider registration functions currently managed by the HI Service would be transferred to AHPRA which, as suggested by the above Recommendation, would help standardise and streamline provider registration and associated information management processes.

NEHTA submits that expanding the role of AHPRA in this way would greatly assist the allocation, adoption and ongoing use of Individual Healthcare Provider Identifiers (HPI-I).

**Education and Training**

Part II of the Consultation Paper broadly considers the role of AHPRA, Accrediting Authorities and the National Boards in relation to workforce reform including the provision of education and training environments to address changes in technology.

NEHTA submits that AHPRA has the unique benefit of access to a broad range of healthcare professionals and could take advantage of their position by providing communications and education to its members on a number of health workforce matters including emerging technologies such as eHealth. In particular, AHPRA could take a lead role in providing education and training to its members about Healthcare Provider Identifiers (HPI-Is), how these Identifiers are used and protected in the health sector as well as information about their crucial role in other eHealth initiatives such as the eHealth Record System.

This view is supported by the HI Act and Service Review which noted:

*At present AHPRA’s sole function in relation to the HI Service is as a Trusted Data Source, however there are opportunities to leverage AHPRA’s regular interactions with providers to expand the communication and promotion of eHealth programs. This would be facilitated through the inclusion of AHPRA in formal governance groups.*

**Healthcare Identifiers Act and Service Review – June 2013**

As noted in our first stage submission, NEHTA submits that the NRAS Review should consider the HI Act and Service Review in more detail as it relates to AHPRA and the National Law.

We note that many of the recommendations in the HI Act and Service Review relate to changes in the HI Service and/or amendments to the *Healthcare Identifiers Act 2010* itself, however the NRAS Review could be a mechanism to consider the impact of these recommendations on the National Law.

As such, NEHTA submits that the relevant recommendations in the HI Act and Service Review be considered by the Independent Reviewer.


More broadly speaking, the NRAS Review itself, through its stated aims of looking at the interface between the Scheme and jurisdictional practices, presents a crucial window of opportunity to revisit the overall interaction between the NRAS and eHealth in Australia. This could be through further consideration of how the implementation of the HI Service and the eHealth Record system could be supported through closer governance arrangements and information-sharing with AHPRA.

NEHTA stands ready to support the NRAS Review process and if the Review team seeks further information or clarification on the above, please do not hesitate to be in contact. Mrs Sally Stewart (sally.stewart@nehta.gov.au) is responsible for managing queries and providing further information as required for the NRAS Review.

Thank you in advance for your consideration.

Yours sincerely

[Signature]

Sally Stewart  
Policy and Privacy Manager (Acting)  
NEHTA