

Submission to the Senate Inquiry into ;The administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA) and related matters, including but not limited to:  
Senate Inquiry March April 2011

My address to the terms of reference are as outlined below :

*Abstract Summary . : AHPRA is difficult to contact, the call centre staff are not knowledgeable, the competent staff in the State offices are inaccessible. The website is inadequate, does not respond to requests and insufficiently informative. The response time is tardy and inefficient. AHPRA has not issued tax receipts , AHPRA does not issue registration certificates to registered individuals only to third parties. AHPRA is expensive and at personal cost to registrants*

*(a) capacity and ability of AHPRA to implement and administer the national registration of health practitioners; Personal Experience : Interim Translation Period , June 2010 from the Dental Board of Queensland. My registration details were incorrectly translated from the Dental Board of Queensland (DBQ). Initially AHPRA staff tried to tell me that one of my Dental Specialties did not exist and could not be registered and that I am entitled to be registered in two specialities was beyond the understanding of the staff I dealt with. Then later with the renewal forms two specialities were not accommodated with space on the generic renewal form sent November 2010. Over the last 20 years I have had no problems with the Dental Board of Queensland. I estimate about 10 phone calls and 5 emails to sort this.*

Experience of Colleagues and Staff: I know of five colleagues who did not receive renewal papers after translation from DBQ to AHPRA in late 2010

*(b) performance of AHPRA in administering the registration of health practitioners;*

There are only two means of contacting AHPRA,

1. A 1300 telephone No. either engaged or on hold 95% of the time.
2. An embedded contact by email on the website which is not answered promptly and queries not addressed.

Personal Experience;

- I received registration renewal papers in November 2010; I returned them in the mail.
- I noted early December that the amount was not cleared from my account.
- The website informed me (to the effect of) that some applications that expired 30 November 2010 were still in process. .
- By 29 the December I tried to contact AHPRA by email through the website four times, there was no reply for two weeks and only then to be advised “thank you for your query.’

- I was also telephoning whilst I was in the UK and phoning after midnight with a call plan that only allowed a 45 minute hold. One night I dialed the number 26 times only to get the engaged tone and then finally got hold and had to relinquish it after 45 mins.
- Finally I got through by phone but AHPRA had put me through to NSW. There were floods in Queensland. The team member sent me an email with the email address of the officer in Queensland. Unfortunately he spelt her name incorrectly, after it bounced back I realized it was probably the same person who had worked previously for the DBQ and from another email from the past knew the correct spelling and was able to make contact.
- By the 15th of January 2011 I was not on the register.
- When finally speaking to a person in a state office he said I was not registered because I had not returned the forms, but I had returned the forms by both mail and more recently by fax. A further comment from him proved that at least the fax had been received because he referred to the content of the fax
- I estimate 18 hours of my time have been consumed in the registration process.
- I only obtained the direct phone No of the state office from a colleague.

Colleagues; 5 colleagues can relate similar contact issues and forms that they contend they mailed, that AHPRA deny receipt of.

RECEIPTS: AHPRA is yet to issue receipts for registration forwarded to them in November 2010 for which payment has been taken and registration. Neither I nor at least 30 colleagues have a tax receipt.

CERTIFICATION OF REGISTRATION: AHPRA has declined to over certificates or confirmation of registration to the INDIVIDUAL who is registered, but offers this only to employers or prospective employers. This significantly impacts on the registration of health professional seeking positions and further training overseas and trying to register in the other countries, e.g. proof of registration is required by a dentist trying to register in the UK with the General Dental Council (GDC), it is the applicants responsibility to provide this with the application the GDC does not view it as its role to seek this information

*(c) Impact of AHPRA processes and administration on health practitioners, patients, hospitals and service providers;*

Waste of Time ; Personal and Professional, excess consumption of time for self and many colleagues; Many health professional have spent many hours of work time on the registration process detracting from time that could be spent on patient care.

Lack of Transparency of the Register (online) and difficulty to find a practitioner for professionals and public, it is difficult to use and there is only one search mode by name

- e.g. it is impossible to use the register to search for say;  
Gynecologists in NSW that is (specialist medical practitioners)  
Periodontists in Melbourne  
Midwives in Darwin

- The exact spelling of the name is required for a successful search.

- The register is not historical, i.e. Not able to find someone registered previously e.g last year when a service in question was rendered.
- Not able to discriminate sub specialty, say as in dental, e.g oral health therapist, versus dental therapist. Or e.g , general nurses from midwives
- There is no definition on the site of what the practitioner can do and scope of practice for the benefit of the public. i.e. Definition of radiographer versus radiologist, oral health therapist versus dentist.
- There are no working links on the website to feed the public or health professionals to other sites that may give the information in clause above.
- There are no notifications /identifications of AHPRA staff roles or names of incumbents, e.g. CEO , Executives etc on the website.

*(d) Implications of any maladministration of the registration process for Medicare benefits and private health insurance claims; Personal Experience; Medicare would not pay for services during the time allegedly not on the register. Medicare would not pay at the Specialist Rate for when one of my specialties was initially not acknowledged by AHPRA during the translation from DBQ*

*(e) legal liability and risk for health practitioners, hospitals and service providers resulting from any implications of the revised registration process; AHPRA has declined to define the time I was allegedly unregistered after they received it, but were processing it prior to display on the website. I knew they had received the forms because they verbally acknowledged this, but I am not certain if I practiced in this time*

*(f) liability for financial and economic loss incurred by health practitioners, patients and service providers resulting from any implications of the revised registration process; I lost 2 days of employment at \$ 83.00 p/h. My services to the Aboriginal Health Service (AHS ) to indigenous disadvantaged people were withheld and some experienced no pain relief because there was no one else to treat them. The AHS lost anticipate claims from Medicare*

*(g) Response times to individual registration enquiries; Personal experience;*

- It took 11 working days to respond to the first of four requests via the website link to “contact us.” Then it was only an acknowledgement not an address to the query. There is no direct email address and no record or receipt no to the query and therefore also no email from a personal address to prove that an attempt was made to contact AHPRA.
- No answer to 26 dialed phone calls in one day, they timed out or the line was just engaged.
- When call centre phone was answered they were unable to assist then I was cut off on the phone when put through to State office.

- Call centre staff refusal to give the State office direct phone number. Told they are busy requested I phone back later.

Estimate 18 hours of my time at least consumed and extra expense phone calls and faxes

*(h) AHPRA's complaints handling processes;* I had in sufficient confidence to expend any more of my time in trying to make complaint

*(I) budget and financial viability of AHPRA;* to date I have spent more than twice than in previous years on my registration at personal cost to me ( only tax deductible at marginal rate ). I see a register that is less useful to me as a practitioner than the state registers were. I read and see copious information from AHPRA that I consider patronizing, outlining my /our professional responsibilities, advising on standards that I contend that I, and my colleagues have adhered to for decades

*(j) any other related matters.*

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