

Diabetes Products Section
Pharmacy Branch (MDP 963)
Department of Health
GPO Box 9848
Canberra ACT 2601

By email: ndss.products@health.gov.au

To whom it may concern,

Re: Feedback on the *Diabetes Products Subsidised under the National Diabetes Services Scheme (NDSS) Consultation*.

The Australian College of Nursing (ACN) would like to thank the Department of Health for the opportunity to provide feedback on the public consultation on Diabetes ***Products Subsidised under the National Diabetes Services Scheme (NDSS)***. ACN considers the role of nurses in the prevention and management of chronic disease, including diabetes, to be integral to ensuring optimal health outcomes for people across all settings and across their lifespan.¹

In collaboration with NPS MedicineWise, ACN has previously provided recommendations for safer self-management practices for people with diabetes as part of the Choosing Wisely Australia Initiative.^{2 3}
^{4 5} ACN currently provides continuing professional development (CPD) courses on diabetes for its nursing membership across Australia.⁶ ACN continues to promote better outcomes for people with diabetes through the ACN Chronic Disease Policy Chapter established in April 2018 and headed by Professor Lisa Whitehead (MACN) and Ms Robyn Quinn (MACN).

Complications arising from poor management of type 1, type 2 and gestational diabetes, presents a significant burden to the health system. Diabetes NSW and ACT noted that *'the rate of potentially preventable hospitalisations due to diabetes complications has risen 4% between 2017-18 in Australia'*.⁷ The Australian Institute of Health and Welfare (AIHW) reported that in 2015 there were 16,400 deaths due to diabetes; and 1 million hospitalisations associated with diabetes in 2015–16.⁸ Diabetes Australia has reported that there are 10,000 hospital admissions in Australia for diabetes-related foot ulcers every year with many leading to costly foot amputations.⁹

¹ ACN 2019. "The role of nurses in chronic disease prevention and management in rural and remote areas". Accessed at: <https://www.acn.edu.au/wp-content/uploads/position-statement-role-nurse-in-chronic-disease-prevention-management-rural-remote-areas.pdf>

² NPS MedicineWise 2016. "Australian College of Nursing: tests, treatments and procedures nurses and consumers should question". Accessed at: <http://www.choosingwisely.org.au/recommendations/acn>

³ Pulvirenti M, McMillan J, Lawn S. Empowerment, patient centred care and self-management. *Health Expectations* 2014;17(3):303-310.

⁴ Funnell M, Anderson RM. Empowerment and self-management of diabetes. *Clinical Diabetes* 2004;22(3):123-127.

⁵ Ahola AJ, Groop PH. Barriers to self-management of diabetes. *Diabetic Medicine* 2013;30(4):413-20.

⁶ ACN 2019. "Diabetes – CPD face to face". Accessed at: <https://www.acn.edu.au/education/diabetes>

⁷ <https://diabetesnsw.com.au/helpful-resources/news/preventable-hospital-admissions-on-the-rise/>

⁸ <https://www.aihw.gov.au/reports/diabetes/diabetes-compendium/contents/hospital-care-for-diabetes>

⁹ <https://www.diabetesaustralia.com.au/fact-and-figures>

ACN is aware of the changes made to the NDSS on 1 March 2019; and is supportive of the funding allocated to expand free access to glucose-monitoring technology to assist children, pregnant women, and more adults with type 1 diabetes to manage their condition.^{10 11}

In response to this consultation ACN would like to see the following products subsidised through NDSS in order to improve health outcomes, quality of life and affordability for people and families living with diabetes:

- **Continuous Glucose Monitoring Devices (CGM):**
ACN is of the view that the continuous blood glucose monitoring functionality and alert system provided by this device is potentially life-saving and has the capability to reduce the need for preventable and emergency hospital admissions.
- **Flash Glucose Monitoring Device (FGM) including Libre Sensors:**
ACN is of the view that the sensor technology of this device which eliminates the need for skin/finger pricking would be beneficial to people with diabetes whom find this a rate limiting step in their diabetes management including young children.
- **Blood Ketone Test Strips (BKTS):**
ACN understands the value in blood ketone test monitoring which can prevent diabetic ketoacidosis, a serious diabetes complication and medical emergency resulting from hyperglycaemia.
- **Lancets and Sharps Disposable Containers:**
These containers are necessary to dispose of sharps and clinical waste safely, which may potentially also be infectious. ACN suggests setting up a similar service to the NSW Needle and Syringe Program¹² where used syringes are returned to a health service and an equal number of syringes are provided to the user to safely dispose clinical waste and reduce risk factors such as spread of diseases including HIV/AIDS and hepatitis. While this initiative targets injectable drug users (non-legal use of drugs), providing a cost-free service would prove beneficial to diabetes sufferers who would need to invest in costly lancets, blood test strips and syringes to manage their condition effectively.
- **True Plus Fast Acting Glucose Tablets:**
The risk of hypoglycaemia is genuine for people with diabetes. ACN is of the view that fast acting glucose tablets are a necessary to restore sugar levels quickly and effectively. The cost

¹⁰ NDSS 2019. "Previous Changes to the NDSS". Accessed at: <https://www.ndss.com.au/important-changes-to-the-ndss>

¹¹ NDSS 2019. "Expansion of Access to Glucose Monitoring Technology". Accessed at: <https://www.ndss.com.au/news/15619?type=articles>

¹² NSW Health 2017. "NSW Needle and Syringe Program". Accessed at: <https://www.health.nsw.gov.au/csm/Pages/nsp-guidelines.aspx>

of these tablets should be subsidised to aid people in their diabetes self-management and prevention of any potential hospital admissions.

- **Insulin Pumps:**

ACN is aware that while this device is not suitable for all people with diabetes, it can reduce the frequency of severe hypoglycaemia in a cohort of people and should therefore be accessible to them if they wish to use the device to improve their quality of life and to improve suboptimal blood glucose control.

ACN would also like to provide some comments regarding the NDSS and diabetes management:

- The NDSS should consider providing face-to-face education to people with diabetes as part of supporting their self-management and diabetes self-care. According to the National Institute for Health and Clinical Excellence and endorsed by the Royal Australian College of General Practitioners (RACG), *'patients and their carers should be offered a structured, evidence-based education program at the time of diagnosis, with an annual update and review'*.¹³ ACN is concerned that if patients lack the confidence to use and troubleshoot their devices, they may neglect self-care practices due to lack of guidance and knowledge. People need to be given the opportunity to ask questions and learn how to use diabetes products and devices in an environment that encourages hands on use. Education should also focus on how to troubleshoot devices to avoid re-purchasing and need for repeated repairs. Community pharmacies generally provide this service to patients on purchase of diabetes devices and products, however more time is generally required by clients to process the plethora of information given to them in a short pharmacist consult.
- ACN's nursing membership reported that the additional cost to people with diabetes may amount to between \$5k-\$10k per year. When compared to people not living with this chronic condition, it is evident that the additional cost for self-management presents a significant financial burden for people with diabetes, some of whom may not be able to afford these costs. ACN is of the view that people with diabetes should not have to pay for products and items necessary in regulating their diabetes. Careful consideration must be given to the funding model for families with children with diabetes.
- ACN's nursing membership would like to suggest considering funding for an initial personal training session consult for people with diabetes, to encourage lifestyle factors that improve quality of life and the need for over use of diabetes products. Long term optimisation of blood glucose levels have demonstrated a delay in onset of complications associated with diabetes, improved quality of life and reduced cost requirements on the government.

¹³ National Institute for Health and Clinical Excellence. Type 2 diabetes in adults: management. [NG28]. London: NICE, 2015.

- ACN's nursing membership highlighted that a cohort of people with diabetes, find the need to obtain a doctor's form for their diabetes products every 6 months inconvenient, and would like to see changes that encourage less barriers to self-care.

ACN is the pre-eminent and national leader of the nursing profession. We are committed to our intent of advancing nurse leadership to enhance health care and strongly believe that all nurses, regardless of their job title or level of seniority, are leaders.

Please contact ACN's Policy and Advocacy Manager, Dr Carolyn Stapleton, at carolyn.stapleton@acn.edu.au if you have any questions or would like further information.

Yours sincerely



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Australian College of Nursing
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