

28 September 2012

Registrar
Dietitians Board of New Zealand
PO Box 10 140
The Terrace
WELLINGTON 6143

Dietitians Board Submission to prescribe selected oral prescription only medicines as Designated Prescribers

Thank you for inviting the Health and Disability Commissioner to comment on the Dietitians Board of New Zealand's submission to the Ministry of Health, in relation to the prescribing of selected oral prescription only medicines as Designated Prescribers (the submission).

The Commissioner is charged with promoting and protecting the rights of health and disability services consumers, as set out in the Code of Health and Disability Services Consumers' Rights (the Code). One of the Commissioner's functions under the Health and Disability Commissioner Act 1994 is to make public statements in relation to any matter affecting the rights of health or disability services consumers.

Cooperation among providers

From this Office's perspective, the submission is a well-detailed and thorough document. In particular, we commend the Board on having emphasised that good communication between dietitians and medical practitioners is the key to the success of shared prescribing rights. We agree that there is a benefit to patients being able to obtain prescriptions for certain medicines directly from the dietitian, rather than requiring referral back to a medical practitioner. However, this benefit needs to be balanced with ensuring any medicines prescribed by dietitians do not adversely affect or interact with other medicines that the patient may be taking, or other medical conditions the patient may have. The importance of cooperation between providers is recognised in Right 4(5) of the Code, which states that "every consumer has a right to co-operation among providers to ensure quality and continuity of services".

A key issue in maintaining continuity of care is the recording of adequate and appropriate clinical notes. Clinical records underpin safe, effective and timely clinical practice, and the importance of adequate documentation is accentuated when a patient receives care from more than one provider as part of a collaborative team approach to care. It is therefore important that dietitians who are endorsed as Dietitian Prescribers consistently maintain accurate and comprehensive clinical records.

We therefore suggest that the Board gives consideration as to how Dietitian Prescribers will communicate information about their prescriptions to their patients' GPs. It may also be useful to develop guidelines for referral back to GPs in situations where there are complicating factors (e.g. the possibility of an adverse interaction with other medicines that are being taken).

Qualifications and competence

From a health consumer's perspective, it is important that the training programme established by the Board provides Dietitian Prescribers with the necessary skills and knowledge to ensure that prescription services provided to health consumers are of an appropriate standard. I trust that the Dietitian Prescribers will be comprehensively educated on prescribing, and that the Board will provide ongoing education as appropriate.