

14 November 2012

PBS Post-Market
Department of Health and Ageing
MDP 900
GPO Box 9848
CANBERRA ACT 2601

Dear Sir/Madam

Post Market Review of Products Used in the Management of Diabetes: Stage 1

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a submission to Stage 1 of the Post-Market Review of Products Used in the Management of Diabetes, which considers the utilisation and patterns of use of blood glucose test strips and the clinical outcomes and benefits of self-monitoring of blood glucose for people with type 2 diabetes not treated with insulin.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF and its members have a strong interest in the availability of publicly subsidised medicines and other treatments to Australian consumers. We are well aware of the challenges of providing ongoing access to affordable medicines and treatments while at the same time ensuring the sustainability of the health system into the future. CHF therefore welcomes the current review, particularly as it aims to review the management of diabetes overall, rather than considering particular products in isolation.

The need to consider usage of particular products in the context of broader management of diabetes is particularly relevant for Stage 1 of the review, which is considering blood glucose test strips in line with Terms of Reference 5 to 7 of the review:

- Describe the utilisation and patterns of use of self-monitoring of blood glucose (SMBG) for people with type 2 diabetes;
- Determine the clinical outcomes and benefits (e.g. HbA1C) of SMBG relative to HbA1C monitoring alone for people with type 2 diabetes not treated with insulin;
- Consider the clinical criteria for eligibility for subsidised access to blood glucose test strips under the PBS and NDSS, accounting for clinical benefits offered through SMBG compared to regular HbA1C monitoring.

CHF has consulted with its member organisations with an interest and/or expertise in diabetes to inform the submission to Stage 1 of the review. Perspectives from our member organisations regarding the use of blood glucose test strips for self-monitoring of blood glucose vary, with conflicting views about whether use of test strips should remain at current levels or be reduced. There was consensus, however, that regardless of how blood glucose test strips should be used, self-monitoring of blood glucose needs to be supported by better access to support and education from relevant health professionals, including diabetes educators.

Drawing on our consultations with member organisations, and consideration of the broader healthcare context, CHF therefore argues that any recommendations regarding the utilisation, availability and subsidisation of blood glucose test strips should be accompanied by recommendations regarding appropriate access to health professionals to support diabetes management.

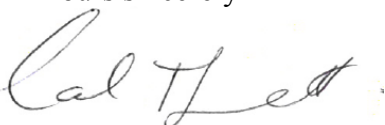
Should availability and subsidies for blood glucose test strips for people with type 2 diabetes not treated with insulin be maintained at current levels, improving access to relevant health professionals would support these consumers to ensure they are using test strips correctly, and to better understand the results and how they can be used to support diabetes self-management.

Alternatively, should the review determine that there should be a reduction in the usage and public subsidies for blood glucose test strips, this should be accompanied by improvements in access to healthcare professionals, such as diabetes educators, who can provide support in self-management of diabetes in the absence of self-monitoring of blood glucose, and can also work with the consumer to identify if it is necessary for the consumer to commence self-monitoring with blood glucose test strips. These health professionals could also be involved in assessment of the consumer's eligibility for access to subsidised test strips, should there be changes to current eligibility criteria.

Better access to health professionals to support diabetes self-management is likely to result in improved self-management and, as a result, savings to the healthcare system. In CHF's consultations with consumers about self-management, including through our Chronic Conditions Self-Management Project (2008-2010), consumers have indicated that, while they want to be able to self-manage their chronic conditions, they do not want to do this in isolation. Support from relevant health professionals is seen as an important factor that contributes to the success self-management. Given the role that self-monitoring of blood glucose plays in the self-management of diabetes, it is important that the current review takes into account consumers' interactions with health professionals, and how these interactions support self-management of non-insulin dependent type 2 diabetes.

CHF appreciates the opportunity to provide a submission to this consultation. If you would like to discuss these comments in more detail, please contact CHF Deputy Chief Executive Officer, Anna Greenwood.

Yours sincerely



Carol Bennett
CHIEF EXECUTIVE OFFICER