

**Breast Cancer Network Australia  
Submission to the RORIC QWG  
Radiation Oncology Practice Standards – Options Paper**

**21 September 2011**

**About Breast Cancer Network Australia**

Breast Cancer Network Australia (BCNA) is the peak national organisation for Australians personally affected by breast cancer. We empower, inform, represent and link together people whose lives have been affected by breast cancer.

BCNA represents more than 60,000 individual members and 305 Member Groups from across Australia.

BCNA works to ensure that women diagnosed with breast cancer and their families receive the very best information, treatment, care and support possible – no matter who they are or where they live. BCNA is represented by the pink lady silhouette. The pink lady depicts the organisation's focus – women diagnosed with breast cancer.

**Submission**

Breast Cancer Network Australia welcomes the opportunity to provide feedback to the Radiation Oncology Reform Implementation Committee (RORIC) Quality Working Group's (QWG) options paper on the Radiation Oncology Practice Standards.

We have chosen to provide a response in letter format rather than via the response booklet, because the booklet does not allow us to provide general comments about the options paper.

**Radiation Oncology Practice Standards**

BCNA supports the development and implementation of standards that contribute towards continuous quality improvement in the radiation oncology sector, which we hope will lead to improved overall outcomes for women with breast cancer.

We commend the consumer involvement in the development of the Practice Standards, and would welcome the opportunity to be involved in the current consultation process and in implementing the standards.

In our internationally recognised *Seat at the Table Program*, Consumer Representatives represent BCNA in a wide range of forums including national, state and territory, and local committees, working parties and conferences. They also provide critical reviews of resources being developed for women with breast cancer, and we would be happy to engage them in assisting with the implementation of the Practice Standards.

## **Radiation Oncology Practice Standards – options paper**

Broadly speaking, BCNA supports models of implementation that will result in the highest number of radiation oncology facilities not only implementing the standards, but also complying with levels of performance that are considered acceptable.

Regardless of what model of implementation is used, it is important that long term funding is allocated to the assessment of the standards, so that assessments can continue to take place well into the future and consumers can continue to be reassured that services they are receiving are of the highest standard.

### **Assessment options**

In terms of who should perform assessments on radiation oncology facilities, BCNA prefers a model which combines peer assessment with external surveyor assessment. This model is preferable because:

- Self-assessment alone cannot be externally verified, and random audits of facilities would not necessarily identify low-performing facilities.
- Peer-assessments alone may allow for conflict of interest between those who are conducting assessments and those who own/manage the facilities being assessed.
- Including an external assessor in a peer-based model would reduce the likelihood of a conflict of interest between peers. External assessors are also likely to be well trained and accredited in performing assessments, enabling them to ensure that high quality, professional assessments are undertaken.

### **Participation options**

BCNA's preferred model for participation is the incentive-based model. We favour this model because we believe:

- It will result in a high level of participation; particularly if the incentive provides an imperative to do so (e.g. removal of Medicare rebates for underperforming facilities).
- Low-performing facilities will have an incentive to participate in order to remain eligible to receive Medicare rebates, which will contribute to overall quality improvement across the sector.

BCNA has concerns that the voluntary participation model may result in low participation levels. In particular, low-performing facilities may avoid participation. This is problematic because those who are being treated at low-performing facilities would benefit the most from these facilities participating in assessments, and their lack of participation may reduce overall quality improvement across the sector.

### **Other issues**

BCNA believes that assessing radiation oncology facilities against the Radiation Oncology Practice Standards alone will not necessarily lead to an improvement in quality. In order to ensure continuous quality improvement, we believe that facilities that

are assessed and found to be under-performing should be required to improve their performance and held accountable for this.

BCNA has concerns that this issue was not addressed in the options paper. In particular, it is unclear:

- Whether under-performing radiation oncology facilities will be required to improve their performance to an acceptable level.
- How under-performing radiation oncology facilities will be governed to ensure they improve their performance to an acceptable level.

For a number of years, BCNA has been involved in The Royal Australasian College of Surgeons (RACS) National Breast Cancer Audit (NBCA), which aims to improve the quality of care by surgeons for patients with early breast cancer in Australia and New Zealand. In particular, BCNA Consumer Representatives were involved in developing a process to review surgeon performance against the standards. We would be happy to contribute our experience and expertise in this area of implementing the Radiation Oncology Practice Standards.

BCNA also has concerns about how the findings of radiation oncology facility assessments will be disseminated. In particular, it is unclear in the options paper:

- how the findings of assessments will be reported back to radiation facilities and/or the general public.
- whether consumers will have access to the findings of assessments, in order to inform their choices regarding where to receive radiation treatment.

As the peak national organisation for Australians personally affected by breast cancer, we believe that consumers of radiation oncology facilities would appreciate being able to determine whether the facility they are attending is committed to quality improvement by participating in Practice Standard assessments. We believe that, like the NBCA, participating facilities should be listed on a website for consumers to access.

Finally, to ensure that the voice of consumers continues to be heard, BCNA encourages consumer involvement during the current consultation process and in implementing the standards.

Thank you for the opportunity to provide feedback to this options paper. For further information on our submission, please contact Annie Gayed, Policy Officer, on (03) 9805 2595 or at [agayed@bcna.org.au](mailto:agayed@bcna.org.au).



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