

Re: Proposed regulatory reforms to enhance protections for Victorian life support customers

Background

The Victorian Respiratory Support Service (VRSS) is a state-wide specialist program that provides care for people with chronic ventilatory failure including implementation of ventilation and long-term care in the community for patients requiring domiciliary ventilation.

We currently have over 1300 patients using a ventilator and approximately 130 of these are considered ventilator dependent. All VRSS patients are given a form to register with their electricity provider as a life support customer when they are set up. Most patients are considered vulnerable regardless of dependency status as they require a ventilator to maintain their respiratory health. Many of these patients have progressive conditions that move them from not being ventilator dependent to ventilator dependent quickly, and any delay in registering with their electricity provider could prove fatal in the case of a power outage. Restricting life support customers to those only determined as ventilator dependent introduces a risk to these vulnerable patients.

VRSS provides a ventilator dependent list to the Department of Health during power outage emergencies, however, the parameters for this are broad (more than 20,000 customers without power for over 24 hours) and the back-up for ventilated patients is through registering with their electricity provider.

Stakeholder questions and responses

Question 1. Do you have any views on the proposed definitions? Would they appropriately capture all life support customers' needs, including those that do not involve equipment, such as refrigeration for insulin pumps?

We would recommend that there be an alteration to the proposed definition for ventilation patients. We would strongly recommend that all patients who use non-invasive or invasive ventilation be considered eligible for life support protections. Due to the complex and frequently progressive (including rapidly progressive) nature of chronic respiratory failure, for which non-invasive ventilation therapy is an appropriate and evidence-based treatment, we recommend that all individuals using non-invasive ventilation be considered vulnerable and eligible for life support protections.

Question 5. Do you have any views on requesting an updated medical confirmation form from life support customers every four years? Is four years a reasonable timeframe?

We would support a four yearly medical conformation review for the ongoing need for life support protections.

Question 6. Should customers with a permanent condition be exempt from the requirement to update their medical confirmation form every four years?

We would agree that customers with a lifelong requirement for ventilation therapy due to a permanent condition, as determined by the medical practitioner, be exempt from the four-year review process.

Victorian Respiratory Support Service