



19 July 2022

Ms Penny Shakespeare  
Deputy Secretary  
Health Resourcing  
Australian Department of Health and Aged Care  
PO Box 9848, Canberra ACT 2601  
Via email: [penny.shakespeare@health.gov.au](mailto:penny.shakespeare@health.gov.au)

Dear Ms Shakespeare,

**Re: Certification of continuous glucose monitoring initiative forms**

On 1 July 2022, it was announced that access to subsidised continuous glucose monitoring (CGM) and Flash GM products for patients with Type 1 Diabetes Mellitus (T1DM) would be expanded via the National Diabetes Services Scheme (NDSS). The RACGP welcomed this decision.

However, the NDSS outlines that health professionals authorised to certify continuous and flash glucose monitoring access forms are those for whom diabetes is the main scope of their practice. With the access form and FAQs specifying that “NDSS cannot approve forms that have been certified by GPs” and that “this is an Australian Government policy decision”. The Department of Health and Aged Care has stated that this decision, to exclude GPs from the authorised certifier group, has been based on expert advice from the Australian Diabetes Society and the Australian Diabetes Educators Association. The RACGP is disappointed we were not consulted and wishes to seek clarification regarding the rationale behind this decision, and recommends that it is reconsidered.

People with T1DM are managed by a healthcare team which GPs are central to. It is unclear why other members of this healthcare team are able to sign this form and GPs are not. As it stands, this decision creates unnecessary barriers to patient access to appropriate and timely care. This form should be managed within a model of current care including the coordinating GP. To exclude them from this form will disadvantage patients, in particular rural and regional patients who may rely completely on their GP for their care.

We urge the Australian government to reconsider and recognise that managing patients with T1DM within a specialist team is within the scope of specialist GPs. In circumstances when managing patients with T1DM is not part of an individual GP’s usual practice or they don’t feel they have the necessary skills to certify access, then advice to seek certification from another member of the healthcare team is appropriate.

If you have any questions or would like to arrange a meeting, please contact Stephan Groombridge, National Manager, eHealth and Quality Care at 03 8699 0544 or [stephan.groombridge@racgp.org.au](mailto:stephan.groombridge@racgp.org.au).

Yours sincerely

Adj. Professor Karen Price  
President