National Health & Hospitals Reform Commission
Submission by the National Institute of Complementary Medicine

The National Institute of Complementary Medicine welcomes the opportunity to make a submission to the National Health and Hospitals Reform Commission Review.

In its first report to Government (Beyond the Blame Game, April 2008), the Commission makes reference to the need for evidence around use and impact of complementary medicine in its discussion at Challenge 5 (Recognising the health needs of the whole person), specifically:

"Many Australians also use complementary medicine services as a form of self-management – these services are not evaluated and there are often no linkages with traditional medicine that can impact on the effectiveness of all care provided."

The National Institute of Complementary Medicine was established to provide leadership and support for strategically directed research into complementary medicine and translation of evidence into clinical practice and relevant policy to benefit the health of all Australians.

The establishment of NICM reflects the shared interest of Government, researchers, practitioners, industry and the public in developing the evidence base for complementary medicine in light of the high rate of use; the size of the industry; and the potential of complementary medicine to address the burden of disease, particularly chronic disease.

- Australia has one of the highest consumption rates (per capita in developed nations) of complementary medicines yet one of the lowest investments in related research.
- Two thirds of Australians use some form of complementary medicine each year and the industry turnover in Australia alone is estimated at $1.5-2.5 billion per annum. There are in excess of fifteen million consultations nationwide each year in herbal medicine, naturopathy, acupuncture, chiropractic and osteopathy alone.
- Complementary medicine is increasingly demonstrating a capacity to address the burden of disease, particularly chronic disease with associated cost savings in terms of reduced hospitalisations and iatrogenic illness. However, there is a need to strengthen this evidence and identify and utilise validated interventions.
- Health research has been demonstrated to be of significant value to national growth and development in both health and economic terms. For example:
  - Annual rates of return lie between 1 and 5 times expenditure in health R&D, with higher rates in some areas, for example cardiovascular disease shows returns of 8 times R&D investment, respiratory a return of 6 and gastro-intestinal a return of five.
  - Longevity returns are estimated at 129% and wellness at 111%
- Notwithstanding the high rate of usage, anecdotal evidence indicates there is a poor rate of disclosure of use by patients receiving other forms of treatment, with associated risks of unknown/ unrecognised interactions.

---

1 Access Economics; Exceptional Returns – the value of investing in health R & D in Australia; 2003
The (draft) principles articulated by the Commission to underpin the health system include continuous improvement and innovation built on a continuum of basic, clinical and health services research (principle 15). NICM strongly endorses this principle, and the associated need to ensure:

- A secure footing for health and medical research funding into the future, including complementary medicine research;
- Pathways to translation of complementary medicine evidence to practice and associated policy, which can be optimised by building on mainstream infrastructure and practice;
- A skilled and informed workforce capable of meeting relevant standards and incorporating evidence in practice; and
- Sources of current and reliable information that engender confidence in government, health practitioners, researchers and the broader community.

Complementary medicine practice is closely aligned with other health system principles identified by the Commission, particularly principles three (shared responsibility) and four (Strengthening prevention and wellness). Many complementary medicine users are seeking to take responsibility and self-manage their health. However, consumers need evidence and accurate information to guide this practice. Similarly, survey responses by general practitioners and specialists indicate an interest and willingness to use complementary medicines where there is confidence in the evidence.

Over the next 6-12 months, NICM will be working with national and international partners on a number of projects relevant to the Commission’s work, including:

- Development of strategies to improve access to cost-effective and reliable sources of information and standards for material developed, used by or linked to NICM.
- Undertaking audits of activity and capacity in complementary medicine research, mapped against national health priorities and burden of disease.
- Commissioning work on the economic returns of complementary medicine research and issues affecting research investment decisions by industry and others.
- Mapping national and international examples and models of integrated care (complementary and mainstream western medicine), and:
  - Developing options to support integrated care pilots of various scales and sizes; and
  - Describing the tools, skills and resources necessary to support pilots that will:
    - Facilitate more accurate and consistent description and assessment of initiatives; and
    - Enable comparisons of efficacy, health outcomes and cost-benefits to be undertaken.

There are a number of examples to draw on, including specialised hospitals, multidisciplinary clinics and teams that incorporate a range of complementary medicine interventions. This initiative strongly aligns with the new Federal Government’s commitment to super-clinics and multidisciplinary care.

NICM would welcome the opportunity of discussing these initiatives with the Commission as part of the broader consultation process being undertaken over the next twelve months.
Recommendations

1. That the national health reform strategy developed by the Commission includes a sustainable and integrated funding framework for basic, translational and population health research that will inform future health policy and practice and that this framework recognises and includes complementary medicine research and practice.

2. That in its deliberations, the Commission has regard to and draws on the health and medical research related submissions made to the National Innovation Review, including the submission by the Australian Society for Medical Research.

3. Having regard to the potential of complementary medicine to address the burden of disease, particularly chronic disease, the Commission includes in its health reform strategy measures that will:
   a. Significantly increase the quantum and rigour of complementary medicine research effort;
   b. Facilitate partnerships between complementary and mainstream health and medical research (basic and clinical) and practice;
   c. Create pathways for clinical trials of complementary medicine to advance knowledge of safety, efficacy, general health outcomes and cost-effectiveness; and
   d. Enable standardised evaluations to be undertaken of the role and value of complementary medicine interventions in multidisciplinary teams and clinics in both in-patient and out-patient settings.

In the context of the broader research and health landscape, NICM would also welcome recommendations by the Commission that lead to an increase in the quantum and share of health investment in evidence based wellness, prevention and early intervention strategies and practices attached to a rigorous evaluation and reporting framework.
The National Institute of Complementary Medicine was established to provide leadership and support for strategically directed research into complementary medicine and translation of evidence into clinical practice and relevant policy to benefit the health of all Australians.

Institute objectives are to:

- Build capacity, foster excellence and attract increased investment in complementary medicine research.
- Articulate national priorities in basic and translational research and promote national and international collaborations to support these, including between complementary and mainstream health and medical research.
- Facilitate translation of research effort into practice and policy, including appropriate integration with the mainstream health system.
- Work with national and international partners to identify and develop sources of accurate information and efficient mechanisms for sharing data and disseminating information about current research activity and evidence of safety, quality and efficacy of complementary medicine.
- Provide advice on opportunities relevant to and issues affecting the complementary medicine research sector to build a policy, regulatory and industry environment conducive to research.
- Collect data and communicate the strength and value of complementary medicine research.

NICM will focus on supporting research that:

- Has the potential to impact positively on the health and wellbeing of all Australians. Emphasis will be given to those areas of high burden of disease where preliminary evidence is strong and demonstrates likelihood of positive impact.
- Elucidates safety, efficacy and cost effectiveness of complementary medicine and translates this into policy and practice.
- Investigates methodological issues relevant to the complex nature of complementary medicine. These include the development of methodological tools, such as measurement instruments, trial designs and pharmacological approaches which may impact on our understanding of the whole practice, concepts and mechanisms underpinning complementary medicine.

Health and medical research has been demonstrated to be of significant value to national growth and development in delivering both health and economic returns. Australia has internationally recognised strengths in basic and translational health and medical research including clinical trials, undertaken at relatively low cost, and which routinely meet US and European regulatory standards

In terms of complementary medicine research:

- Australia has one of the highest consumption rates (per capita in developed nations) of complementary medicines yet one of the lowest investments in related research.
- There is growing evidence that complementary medicine can make a significant, cost-effective contribution, particularly to chronic disease with associated cost savings in terms of reduced hospitalisations and iatrogenic illness. However, there is a need to strengthen this evidence and identify and utilise validated interventions.
- Australia has significant strength in complementary medicine research. However, there is a pressing need to build critical mass and better co-ordinate research effort. International experience is that an effective
strategy for building capacity is to partner complementary medicine practitioners and researchers with mainstream health and science researchers and to support cross-disciplinary research teams.

- The National Health and Medical Research Council (NHMRC) includes complementary medicine as a major health issue in the 2007-2009 strategic plan.
- Exploring traditional (indigenous) clinical approaches may generate new scientific insights into health and disease.

The establishment of NICM in mid-2007 provides a mechanism for a co-ordinated, national approach to building research capacity and addressing complex issues around complementary medicine, including:

- Bridging the gap between the health potential and high level of use of complementary medicine and available evidence.
- Managing the volume and establishing sources of reliable and accurate information about safety, efficacy and value.
- The appropriate role of complementary medicine in the health system.