



Professor Bruce Robinson
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Dear Professor Robinson

MBS Review – Psychiatric Clinical Committee Report

Thank you for the opportunity to comment on the 2019 report from the Psychiatry Clinical Committee. The Australian Private Hospitals Association (APHA) is generally supportive of the proposed recommendations, but wish to make the following comments.

The APHA emphasises **sufficient time be provided by the Department of Health** (the Department) for any item to be classified or reclassified within the National Procedure Banding Schedule (NPBS), and the resulting changes to be provided to hospital in advance of their effective date. The APHA advocates the Department provide full details of the amended items (proposed fee, proposed classification, and any proposed amendments to descriptors) **at least 90 days prior** to the effective date so they can be considered by the National Procedure Banding Committee, and there is sufficient time for hospitals and health insurers to negotiate contract changes and implement system changes.

Furthermore, any new items under recommendation 7 should be classified in the *Private Health Insurance (Benefit Requirement) Rules 2011* (the Rules) where appropriate. The items listed under recommendation 7 currently (items 348, 350 and 352) are classified as Type C, Category 1, Table A8. The APHA advocates the new items should also be classified as Type C, Category 1, Table A8 in the Rules where appropriate.

The APHA notes the Psychiatric report is supportive of the Specialist and Consultant Physicians Consultation Clinical Committee (SCPCCC)'s recommendations on case conferencing. The APHA welcomes recommendations facilitating case conferencing. APHA also advocates provision for case-conferencing by phone/video to support the coordination of teams that are not geographically co-located and teams that are involved in the provision of community/out-reach services. APHA also emphasises that this response should be read along side our response to the SCPCCC.

We welcome the opportunity to comment on this report, and we look forward to further discussions regarding the implementation of recommendations once these are finalised. As the private sector delivers a large amount of psychiatric care to Australians every year, the APHA requests to be included in any Implementation Liaison Group (ILG) should it be convened for the changes to Psychiatric items.

Yours sincerely

Lucy Cheetham
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19 DECEMBER 2019

