

23 November 2020

Ms Apolline Kohen  
Acting Secretary  
Senate Community Affairs Legislation Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

By email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Ms Kohen

Thank you for the opportunity to provide a submission to the Senate Community Affairs Legislation Committee on the Health Insurance Amendment (Compliance Administration) Bill 2020 (the Bill).

The Royal Australian College of General Practitioners (RACGP) is Australia's largest professional general practice organisation, representing over 41,000 members working in or toward a career in general practice.

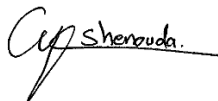
The RACGP understands the Bill will modernise terminology in the *Health Insurance Act 1973* by replacing 'statement' with 'information' to reflect the electronic claiming of Medicare payments.

We have been advised by the Department of Health (the Department) that the proposed amendments do not influence the scope or frequency of debt recovery activities, nor increase the debt recovery powers of the Department. We understand the Bill will not expand the capacity of the Department to undertake compliance activities or increase the administrative burden for general practitioners (GPs) in the event of any compliance activity. The Department has confirmed that the retrospective application does not apply to existing court cases which have not yet been the subject of finally determined proceedings, or proceedings in which judgment is reserved. As such, we have no immediate concerns about the passage of the Bill.

The Committee may like to note compliance processes can be stressful for providers and affect the quality and timeliness of patient care. We maintain that educational activities should be prioritised before compliance activities. Where reasonable, health professionals must be given an opportunity to adapt or rectify their billing practices prior to being subject to compliance activities.

The RACGP looks forward to contributing to further discussions around Medicare compliance. Please contact Ms Leonie Scott, National Manager – Policy & Advocacy, on (03) 8699 0031 or at [leonie.scott@racgp.org.au](mailto:leonie.scott@racgp.org.au) if you have any questions or comments regarding the RACGP's submission.

Yours sincerely



**A/Prof Ayman Shenouda**  
Acting President