



RACGP

Royal Australian College of General Practitioners

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HC Consultation team
Department of Health

Via email: HC.Consultation@health.gov.au

To whom it may concern

Consultation paper: Improving Medicare Compliance

The Royal Australian College of General Practitioners (RACGP) thanks the Department of Health (the Department) for the opportunity to respond to the consultation paper on improving Medicare compliance. The RACGP is Australia's largest general practice organisation, representing over 90% of Australia's general practitioners (GPs). The RACGP advocates and supports GPs, general practice registrars and medical students, and assists GPs with issues that affect their practice.

The RACGP supports the proposed changes to compliance arrangements that will enable the Department of Health to investigate billing by both practitioners and organisations. While such change is likely to lead to improvements in practice administration, it is strongly recommended that protections for GPs be built into this process. These protections should take into account that, in some cases, the organisation employing a GP may have significant influence into how, when and what claims are made to Medicare.

The following feedback outlines the RACGP's position on the proposals put forward in the consultation paper on:

- organisation billing
- compulsory offsetting
- administrative changes and strengthened recovery positions.

Organisation billing

The RACGP is supportive of the changes proposed in sections A1 and A2 of the consultation paper which will modify compliance arrangements to allow for investigation of billing undertaken by both practitioners and organisations. Members have long raised concerns regarding the focus on the billing practices of individual providers, as opposed to practices who often bill on their behalf.

The findings of the Large Practices Project also indicated that practice managers and non-clinical practice staff may have some influence over Medicare billing decisions. As these individuals do not currently have a legal responsibility for compliance, the individual provider may then be held fully responsible for incorrect claims. The RACGP supports the implementation of amendments to current legislation to ensure that liability for Medicare claiming is not placed solely on the provider when they are not solely at fault.



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The value of Medicare compliance education for providers, managers and non-clinical practice staff should not be underestimated. The RACGP therefore recommends that the Department ensure that its Medicare compliance education strategies and materials are appropriate and accessible to all those who may be involved in billing processes. Opportunities for ongoing voluntary education on Medicare billing would also be valuable throughout the provider's career.

When implementing any of the proposed changes, it is vital that privacy considerations are prioritised when collecting sensitive commercial information. This includes when details regarding employment arrangements and financial information are collected from individual providers.

Compulsory offsetting

The RACGP supports, in principle, compulsorily offsetting a portion of future MBS payments against MBS debt for providers.

The RACGP suggests that further clarification of how compulsory offsetting would function is required prior to its implementation under the HIA. Specifically, the RACGP is interested to know how the Department arrived at 20% as the percentage to be automatically withdrawn from a provider's future payments, and whether an impact assessment on providers was undertaken.

Administrative changes and strengthened recovery provisions

The RACGP is not in the position to comment on changes that would affect pharmacists and dentists.

In relation to provider voluntary acknowledgement of incorrect MBS payments, the RACGP believes the changes proposed under C3 are reasonable. The RACGP also supports the changes proposed under C7 (documentation of subsidised services) if they do not increase the administrative burden on GPs.

I hope that this information is of assistance in the review of the *Health Insurance Act 1973*. Should you require any additional information from the RACGP, please contact me or Mr Roald Versteeg, Manager – Advocacy and Policy, on (03) 8699 0408 or roald.versteeg@racgp.org.au

Yours sincerely

Dr Bastian Seidel
President