

26 July 2017

MBS Review Taskforce
mbsreview@urbis.com.au

To Whom It May Concern,

Re: MBS Review Taskforce – Dermatology, Allergy & Immunology

Thank you for your recent invitation to comment on the *Dermatology, Allergy and Immunology Clinical Committee* draft report, prior to the final recommendations being provided to government.


The RACGP reiterates the need to recognise the central role of specialist general practitioners, and their critical role in coordinating patient care. We also believe that there needs to be consistency in terms of rules, regulations and rebates between general practitioners and non-GP specialists (such as dermatologists), regardless of whether it relates to general consultations, radiology, surgery, dermatology, or other. Within this context, the RACGP provides the following comments.

Generally, the proposed recommendations encourage more use of histopathology, which may reduce the chance of misdiagnosis and the inadequate removal of malignant lesions. The RACGP strongly supports the use of histopathology as a marker to detect cancers in skin lesions. This is best practice, and the inclusion is applauded.

Specifically, the RACGP provides comment on the recommended changes to items 30202 proposed on page 22 of the draft report.

Under the proposed recommendations, malignant lesions removed under item 30202 will require histopathology or AMC recognised dermatologist opinion. The RACGP supports the requirement of histopathology, but recommends removing 'or confirmed specialist opinion' from the item descriptor. The same rules should apply to all practitioners and therefore the utilisation of this item number should require histopathology.

Yours sincerely



Dr Bastian Seidel
President