

27 June 2018

Associate Professor Peter Stewart
Chair
Pathology Clinical Committee
Medicare Benefits Schedule Review Taskforce

via email: SurgicalServices@health.gov.au

Dear Associate Professor Stewart

Report from the Blood Products Working Group

Thank you for providing the Royal Australian College of General Practitioners (RACGP) with the opportunity to comment on the recommendations made by the Blood Products Working Group (the Working Group) as part of the Medicare Benefits Schedule (MBS) Review.

This submission:

- provides feedback on the Working Group's recommendation to delete item 13706 for transfusion of blood (Recommendation 1)
- seeks clarification on the Working Group's definition of multidisciplinary teams within item 13760 for in vitro processing and cryopreservation of bone marrow or peripheral blood (Recommendation 3)
- asks the Working Group about its consideration of new MBS items for procedural services, including those previously recommended by the RACGP to the MBS Review Taskforce.

Recommendation 1

Recommendation 1 proposes several changes to blood product items, including the deletion of item 13706 for transfusion of blood. The working group has suggested that this procedure is performed by nurses and 'is not fundamentally a medical professional service'.

The RACGP does not support the deletion of item 13706 from the MBS as Rural Specialist General Practitioners (GPs) perform transfusions in various settings, including post-operative trauma and obstetrics. They make decisions relating to the transfusion of blood, order blood and make supplementary orders. These GPs are then available to review results and provide advice if there are any adverse effects. Some areas in Australia do not have hospitals that manage or provide blood transfusions, so rural GPs provide this service to patients. The deletion of the item would reduce the support available to patients receiving this care from GPs in these areas.

The RACGP notes that the Working Group has considered 'several options to better align use of item 13706 with clinical need'. The RACGP recommends that the Working Group reconsider such options

before a recommendation is made to Government, to allow the GPs who provide patient care supported by this MBS item to continue to do so where appropriate.

Recommendation 3

The Working Group has also proposed amending the descriptor for item 13760 to specify that the item be for use 'as part of a treatment program overseen by a multidisciplinary [cancer] team experienced in the treatment of malignant disorders.' The RACGP requests that the Working Group clarify what practitioners are suitable members of this multidisciplinary cancer team and if it considers such teams will include GPs.

Support for the provision of blood product services in general practice

The RACGP made a recommendation to the MBS Review Taskforce in March 2017 for the addition of an MBS item to support IV cannulation, among other procedural services, in general practice. GPs perform this procedure to provide a range of services, including iron infusions. Providing iron infusions in general practice significantly reduces the cost of the service to the patient. It also helps rural patients, who otherwise have to travel for this service or experience lengthy waiting times to see another service provider or medical specialist.

The RACGP is interested in the Working Group's consideration of new MBS items for procedural services, including recommendations the RACGP made to the Taskforce to support GPs to provide blood product services. Where a GP can provide a procedural service, MBS rebates should be available to support patient access to this care from their GP or general practice.

I trust this information is useful to the Working Group and Pathology Clinical Committee. If you have any questions about the RACGP's submission, please contact me or Ms Susan Wall, Program Manager – Advocacy and Funding, on (03) 8699 0574 or at susan.wall@racgp.org.au

Yours sincerely



A/Professor Charlotte Hespe
Vice-President