

28 November 2019

MBS Policy and Specialist Services Branch
Medical Benefits Division
Department of Health
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Canberra ACT 2601

By email: surgicalseervices@health.gov.au

To whom it may concern

Amendments to MBS items for respiratory function tests and sleep studies

The Royal Australian College of General Practitioners (RACGP) thanks the Department of Health (the Department) for the opportunity to provide feedback on the proposed amendments to Medicare Benefits Schedule (MBS) items for respiratory function tests and sleep studies.

Our feedback specifically relates to the proposed change to items 12203 and 12250. This change would lower the STOP-Bang questionnaire score requirement to 3 (from 4) to support access to testing for patients with symptomatic, moderate to severe obstructive sleep apnoea.

The RACGP welcomes any efforts to increase access to diagnostic sleep studies for patients with sleep apnoea, including reducing the STOP-Bang score requirement from 4 to 3.

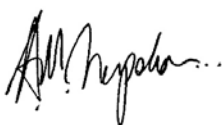
As noted in the RACGP's [earlier response](#) to the Department, our members have raised concerns that current sleep assessment tools are not effective for supporting patients with conditions that suggest an underlying diagnosis of sleep apnoea.

Members have also reported that the STOP-Bang questionnaire is difficult to administer for patients who live alone – particularly women – as two questions rely on others' observations of the patient and one asks if the patient is male. A woman who lives alone will therefore need to score 4/5 on the remaining items.

An example was recently provided to the RACGP of a woman living alone for whom a sleep study was recommended due to her risk factors and health issues (she had cor pulmonale – a condition associated with sleep apnoea). Unfortunately her GP was unable to arrange this for her under Medicare rules because of her STOP-Bang score. As the patient was unable to afford the private fee and felt uncomfortable with an inpatient study, a sleep study was never arranged.

The RACGP looks forward to contributing to further discussions around MBS sleep study items. Should you have any questions or comments regarding the RACGP's submission, please contact either myself or Ms Michelle Gonsalvez, National Manager, Policy and Advocacy, on (03) 8699 0490 or at michelle.gonsalvez@racgp.org.au

Yours sincerely



Dr Harry Nespolon
President