

17 December 2019

Department of Health
GPO Box 9848
Canberra ACT 2601

By email: MBSReviews@health.gov.au

To whom it may concern

Report from the Consumer Panel of the Medical Benefits Schedule Review Taskforce

The Royal Australian College of General Practitioners (RACGP) thanks the Department of Health for the opportunity to comment on the report from the Consumer Panel of the Medical Benefits Schedule (MBS) Review Taskforce.

The RACGP supports many of the principles set out by the Consumer Panel for ensuring consumers are considered in MBS reviews and health technology assessments (Recommendation 1). In particular, Principle 2 aligns with the RACGP's [Vision for general practice and a sustainable healthcare system](#), which demonstrates how well-supported GP teams can deliver sustainable, equitable and high-value healthcare that benefits consumers, providers and funders.

However, Principle 4 (p.37) states:

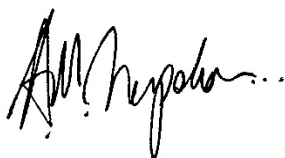
Address geographic location as a barrier by proactively looking at scope of practice of more than one clinical group, and reimbursement for clinical services that reflects the cost of service provision in regional and remote settings

The RACGP seeks further information regarding this principle, and notes that duplication of GP services by non-GP practitioners will not provide consumers with access to high-quality primary healthcare. While allowing expansion in scope of practice may appear to increase access points to healthcare, it can expose consumers to care that is not safe, comprehensive or coordinated. The provision of medical services by health professionals lacking the necessary medical training or registration is an inappropriate and unsustainable solution to addressing the health needs of Australians.

The Panel also recommends that, in implementing the MBS, the listing of multiple items for single consultations or treatments should be inhibited (Principle 12). The RACGP requests further clarification of what the Consumer Panel means by this, and what issue this recommendation is trying to solve.

The RACGP respects and values the role of consumers in these processes, and looks forward to their contributions to future MBS reviews. 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