

12 March 2019

Professor Bruce Robinson
Chair, MBS Review Taskforce

E: mbsreviews@health.gov.au

Dear Professor Robinson,

Re: Draft report from the Plastic and Reconstructive Surgery Clinical Committee

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide feedback and comments on the Medicare Benefits Schedule's (MBS's) *Draft report from the Plastic and Reconstructive Surgery Clinical Committee*.

The RACGP's response covers the following:

1. **General Recommendations 1 and 2:** The RACGP welcomes the Plastic and Reconstructive Surgery Clinical Committee's (Committee's) recommendation to review and increase patient rebates for the provision of services for excision and repair of skin and sub-cutaneous lesions in general practice
2. **Recommendation 4:** The RACGP agrees with the Committee's recommendation to impose restrictions on the use of abrasive therapy on the face
3. **Recommendation 10:** The RACGP agrees with the Committee's recommendation to better describe and clarify the use of MBS Item Number 45563
4. **Recommendation 18:** The RACGP agrees with the Committee's recommendation to create new MBS item numbers for the removal of a single lipoma or other subcutaneous tumour or cyst
5. **Recommendation 35:** The RACGP does not agree with the Committee's recommendation to change the descriptors for MBS Item Number 30003 to place restrictions on burns dressing, and the requirement for a doctor be present

1. General Recommendations 1 and 2

As noted by the Committee, the prevalence of skin cancer is high and set to continue to increase. While patients utilise the services provided by general practitioners (GPs), the cost of performing these procedures has increased significantly, and MBS remuneration has not supported this increase. More GPs are likely to stop providing these services, or introduce out-of-pocket costs to patients, if remuneration is left in its current state. This will lead to an increase in hospital wait time.

2. Recommendation 4: Impose restrictions on the use of abrasive therapy on the face

The RACGP agrees with the Committee's recommendation. The rationale for the recommendation on the original intent of the item and the replacement by laser therapy is acceptable to the general practice profession.

3. Recommendation 10: Better describe and clarify the use of MBS Item Number 45563 (neurovascular island flap)

The RACGP agrees with the Committee's recommendation. Tightening the definition of this item number to prevent inappropriate and/or incorrect claims will help ensure appropriate use of the MBS system.

4. Recommendation 18: Create new MBS item numbers for the removal of a single lipoma or other subcutaneous tumour or cyst

The RACGP welcomes the Committee's recommendation. These new MBS item numbers will ensure GPs are appropriately remunerated for the care of their patients, and will continue to improve patient care.

5. Recommendation 35: Change descriptors for MBS Item Number 30003 to place restrictions on burns dressing, and the requirement for a doctor be present

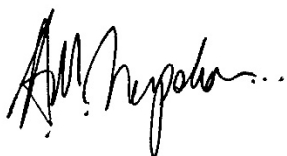
The requirement for a doctor to be present during burns dressing should be re-evaluated. Currently, patient rebate is too low for both a nurse and GP to be present for the burns dressing.

The RACGP also recommends no restrictions on charging out-of-pocket expenses for dressings, and for bulk billing of the item number. Patients should be able to access burns dressing at the convenience of their general practice, and GPs are suitably placed to treat these patients. Allowing patient choice would create health system savings as such patients will not be presenting for outpatient hospital care.

As noted in the general recommendations, the cost of performing these procedures have increased (ie cost of sutures, instruments, dressings), and the MBS has not supported this increase. General practices, often also small businesses, cannot afford to subsidise the cost of performing these procedures. It is neither practical nor convenient for patients to source their own equipment from pharmacies through prescriptions.

Thank you once again for the opportunity to provide feedback and comments. We look forward to hearing about this Review's progress and outcomes.

Yours sincerely,



Dr Harry Nespolon
President