



**Submission to the Diagnostic Services Branch on the Removal of
Restrictions on Pathology Request Forms Discussion Paper**

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Introduction

The Consumers Health Forum of Australia (CHF) is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF welcomes the opportunity to comment on the Department of Health and Ageing's *Removal of Restrictions on Pathology Request Forms* Discussion Paper.

CHF members and stakeholders have a strong interest in issues related to pathology. This submission is informed by our project work in this area through our current Quality Use of Pathology Project, funded by the Department of Health and Ageing, including comprehensive consumer consultation. Our submission is based on the questions raised in the Department's Discussion Paper.

Issue: What are the most effective strategies for ensuring that patients are kept informed in choosing their pathology provider, and understand the importance of keeping their requesting practitioner informed of their choices?

Consumers have identified throughout CHF's consultations that appropriate and thorough communication between the requesting practitioner and the consumer at the time of the consultation is imperative. CHF considers it important that the requesting practitioner should have a comprehensive discussion with the consumer about their right to attend a pathology provider of their choosing. This is also an opportunity to discuss the benefits of the consumer informing the practitioner of their choice of provider. Informed consent is an important part of quality healthcare.

CHF considers it essential that the practitioner and consumer be open in discussing the benefits of different providers so that the consumer is well informed and able to make the best decision about which pathology provider to attend. Effective communication to ensure that consumers are well educated, informed and supported is beneficial for the consumer, the practitioner and the pathology provider.

Throughout CHF's consultations, consumers have indicated they appreciate access to information provided in a written format. CHF would welcome written information (for example a pamphlet or poster) to reinforce consumer's rights, responsibilities and options in relation to choice of pathology provider. This would need to be accessible for all consumers. When developing this literature, consumers from culturally and linguistically diverse backgrounds and consumers with low levels of literacy would need to be considered.

Issue: What factors currently influence patient choice of provider? What impact will increased choice (through more collection centres) or greater variability in billing practices between providers have on patient preferences?

Consumers in CHF's consultations identified cost as a major influence on their choice of pathology provider. Providers that offer bulk billing or testing at a lower cost are considerably more popular among consumers than providers who charge high out of pocket costs for consumers. Consumers have noticed a decrease in providers that bulk bill in recent times. Greater variability in billing practices and choice of providers will enable consumers to seek providers whose billing practices meet their financial needs.

Consumers have identified convenience as being an influencing factor on choice of provider. This may be related to proximity of the collection point to their home, office or medical practitioner. Convenience for consumers can also relate to facilities that have ample parking, public transport accessibility, adequate disabled facilities and ease of access for consumers.

Consumers identified adequately trained and considerate staff as a factor that influences their choice of pathology provider. Waiting time in collection centres may also influence consumer choice. Consumers who are frequent, or high end, users of pathology may be influenced by familiarity of a provider. The variability of equipment between collection points is another factor that may influence consumer choice. An example of this from CHF's recent consumer consultations was of machinery from different laboratories providing results in different formats. This led to confusion for a consumer when he attended a collection point that was not his regular one and received a result that appeared vastly different. Increased choice of provider will give consumers the ability to find a collection centre that suits their needs and preferences.

CHF welcomes the possibility of more pathology collection centres as a result of new legislation, as this will result in increased choice for consumers. Having choice for consumers in where they access pathology testing and access to greater variability in billing practices will enable consumers more freedom and will allow them to take a greater role in their healthcare.

Issue: Are there collection scenarios where the patient's intention regarding preferred providers is not clear? How should these scenarios be managed?

Based on its consultations, CHF considers the main collection scenarios where the patients' intention regarding preferred provider will not be clear is when there is a lack of, or poor, communication between provider and consumer.

Throughout CHF's consultations consumers identified that some members of the community might have difficulty communicating with practitioners and might not be able to clearly state their intention regarding preferred providers. Consumers from culturally and linguistically diverse backgrounds, consumers with an intellectual disability or consumers with low literacy or minors may have difficulty in this area.

More support for communication with these consumers, for example through clear and concise written information, interpreters, or other support people (such as a parent, guardian or advocate), would help these consumers.

Consumers who are not from the local area and have low awareness of local collection facilities may also need guidance from the requesting practitioner to make an informed decision about which pathology provider to access.

The rights of consumers who are too unwell to consent or make an informed decision about a provider need to be considered.

Issue: How can effective professional relationships between requesters and providers of pathology be maintained where patients choose providers other than those preferred by requesters?

Consumers in CHF's consultations have identified that having a strong, ongoing relationship with their medical practitioner is important. If a strong relationship exists, practitioners could communicate to consumers the benefits of choosing a pathology provider with whom they have an ongoing relationship. Consumers indicated they appreciate good quality advice from their medical practitioners. Consumers would be more likely to follow advice from their practitioner about what pathology provider to attend if the reason for their practitioners' preference were effectively communicated to them.

If a consumer chooses to access pathology services from a provider other than the one preferred by their practitioner, consumers would like their practitioners to be supportive of their choice. As outlined above, consumer choice of providers is informed by a range of factors, and medical practitioners need to be aware of these factors.

Effective and collaborative relationships between requesters and providers could be assisted by communication between them about why consumers choose to use or not to use the provider. This could in turn encourage providers to change their practices to attract consumers, for example by offering bulk billing.

Interoperability of systems for electronic transfer of requests and results is an area that may affect relationships. During CHF consumer consultation, consumers identified that their practitioners are only able to receive reports from some pathology providers. It is important that systems work together if consumer choice of provider is to work effectively.

Issue: What is the most effective way to notify patients of their right to choose their pathology provider and make them aware of their responsibilities? How can this be done with minimal impact on those who produce pathology request forms?

Throughout CHF's consultations, consumers have argued that they want increased, high quality communication and advice on their rights and responsibilities around pathology testing. Most consumers consulted identified that they were unaware that they would have any choice about which pathology provider they attended under new legislation. Choice is something consumers value.

An effective way to notify consumers of their right to choose their own pathology provider would be through communication between practitioner and consumer. When making a request for pathology testing, the practitioner should explain to the consumer their rights around choice of provider.

Further to this, consumers would welcome clear, concise and easy to follow literature (for example, brochures or posters) informing them of their right to choose a pathology provider as a supplement to their practitioner's explanation.

Consumers have identified that pathology request forms are currently not always easy to understand. Consumers would welcome amendments so that current pathology forms are not endorsed by any pathology provider and clearly express consumers' right to attend any pathology provider. One concern is the use of pathology request forms with pathology laboratory logos on them which are commonly used.

Standard wording would ensure minimised confusion for consumers and CHF would welcome the requirement for precise wording to be added to the legislation as suggested in the Discussion Paper. It is imperative that wording should be clear, easy to read and free of jargon. Wording should take into consideration consumers with low literacy levels and consumers for whom English is not a first language. The mandatory statement about choice of provider should be positioned on the request form so that it stands out to consumers and be separated from technical terminology and the details of the request.

CHF would encourage font size and colour to be appropriate and conducive to readability. Having standardised particulars (such as wording, font size and colour) could help reduce impact on those producing pathology request forms, as they would not need to spend time or money developing these themselves.

Conclusion

CHF welcomes improvements to increase consumers' choice of pathology provider and hopes that new measures will provide improved safety, quality, efficacy and access for consumers. CHF members have identified that pathology and diagnostic imaging are areas about which they have serious concerns, and further consumer consultation is required. Concerns relate to the quality, accessibility and affordability of services, and choice of provider has the potential to reduce many of these concerns.

CHF would be interested in participating in any forum on this matter. We look forward to ongoing discussions.



The Consumers Health Forum of Australia (CHF) is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

CHF does this by:

1. advocating for appropriate and equitable healthcare
2. undertaking consumer-based research and developing a strong consumer knowledge base
3. identifying key issues in safety and quality of health services for consumers
4. raising the health literacy of consumers, health professionals and stakeholders
5. providing a strong national voice for health consumers and supporting consumer participation in health policy and program decision making

CHF values:

- our members' knowledge, experience and involvement
- development of an integrated healthcare system that values the consumer experience
- prevention and early intervention
- collaborative integrated healthcare
- working in partnership

CHF member organisations reach millions of Australian health consumers across a wide range of health interests and health system experiences. CHF policy is developed through consultation with members, ensuring that CHF maintains a broad, representative, health consumer perspective.

CHF is committed to being an active advocate in the ongoing development of Australian health policy and practice.