

14 June 2023

Community Affairs Legislation Committee  
By email to: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Community Affairs Legislation Committee

**Re: Inquiry into the Health Insurance Amendment (Professional Services Review Scheme) Bill 2023**

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide input on the [Inquiry into the Health Insurance Amendment \(Professional Services Review Scheme\) Bill 2023](#). The RANZCP is the principal organisation representing the medical specialty of psychiatry in Australia and New Zealand and is responsible for training, educating, and representing psychiatrists on policy issues. The RANZCP represents more than 7900 members, including more than 5600 qualified psychiatrists and is guided on policy matters by a range of expert Committees including the Section of Private Practice Psychiatry and the Committee for Professional Practice.

The RANZCP supports changes to the structure and processes of the Professional Services Review (PSR) Scheme that increase transparency and fairness in compliance activities. Amendments to enable consultation with peak bodies regarding the appointment of Directors of the PSR are welcomed. However, further clarification is needed on the proposal to remove the requirement for the Chief Executive Medicare to consult with relevant professional bodies prior to issuing a notice to produce documents. The RANZCP acknowledges that this change has been proposed to streamline the auditing process but has concerns about the impact this may have on individual practitioners being audited. As the RANZCP has previously highlighted in our submission regarding the [Health Legislation Amendment \(Medicare Compliance and Other Measures\) Bill 2021](#), the current process suggests an implied assumption of guilt which may be exacerbated by this change.

The RANZCP reiterates its views that transparency and open dialogue with the profession is the best way to increase compliance and prevent over auditing. Clear information is required on what alternative provision will be put in place to reassure practitioners that engagement with the medical profession remains an integral part of the compliance program before this requirement is removed.

The RANZCP welcomes further consultation on any further amendments to the *Health Insurance Act 1973*. To discuss any of the issues raised in this letter,

Yours sincerely

Dr Elizabeth Moore  
**President**

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