



Ref: S0904

29 March 2010

Ms Naomi Bleaser
Committee Secretary
Community Affairs Legislation Committee
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Ms Bleaser

Inquiry into Health Insurance Amendment (Pathology Requests) Bill 2010

Thank you for the opportunity to provide a submission into the inquiry into *Health Insurance Amendment (Pathology Requests) Bill*.

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 members and stakeholders have a strong interest in issues related to pathology. This submission is primarily informed by our project work in this area through our current Quality Use of Pathology Project, funded by the Department of Health and Ageing, which has included comprehensive consumer consultation on issues related to pathology.

CHF would welcome the opportunity to provide evidence to the committee to ensure that those who use and pay for healthcare have a strong voice on this important issue.

Should you wish to discuss this submission further, please do not hesitate to contact me.

Yours sincerely

Carol Bennett
EXECUTIVE DIRECTOR



Consumers
Health Forum
of Australia

**Submission to the Inquiry into Health Insurance Amendment
(Pathology Requests) Bill 2010.**

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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 provide input into the Community Affairs Legislation Committee *Inquiry Into Health Insurance Amendment (Pathology Requests) Bill 2010*.

CHF members and stakeholders have a strong interest in issues related to pathology. This submission is primarily informed by our project work in this area through our current Quality Use of Pathology Project, funded by the Department of Health and Ageing. CHF has conducted consumer consultation workshops in all states and territories and has held a National consumer and stakeholder workshop. CHF has also provided a submission to the Department of Health and Ageing on this legislation, which is at [Attachment A](#).

Patient choice

Consumers have identified throughout CHF's recent consumer consultations around the quality use of pathology that **choice** is important to them. Consumers want options and choices when making decisions about their health care. Consumers strongly argued for choice in pathology provider, in the same way they have choice in diagnostic imaging, and other health services providers.

Consumers in CHF's consultations identified **cost** of pathology testing as a major concern. 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. Consumers reported a decrease in providers that bulk bill in recent times. This is causing some consumers great financial stress. Greater variability in billing practices and choice of providers will enable consumers to seek providers whose billing practices meet their financial needs.

Consumers have also identified **convenience** as being an influencing factor on the decisions they make about their healthcare. This may be related to proximity of a pathology 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. Inviting consumers to choose where they attend collection points would increase their ability to attend a convenient, comfortable facility which can have impact on health outcomes.

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 play a greater role in their healthcare.

The onus on consumers to make decisions for themselves about where they wish to access pathology testing is something that CHF and our members welcomes. However, consumers also recognise the *importance of discussing their choice of pathology provider with their referring practitioner.*

CHF considers it important for the requesting practitioners to have a detailed 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 and something consumers have identified as currently lacking in their experience of health services. Effective communication to ensure that consumers are well educated, informed and supported is beneficial for the consumer, the practitioner and the pathology provider.

Consumers, in conjunction with their medical practitioner, can be supported to take responsibility for choosing their own pathology provider. Consumers welcome this move, however, understand that the onus is not solely on them, and they have resources to help support them in their decision making.

Possible problems arising between unknown referrers and providers

CHF recognises the potential for problems to arise, such as delays in receiving results, as a result of consumers attending a provider who is unknown to their referrer. However, consumers already experience delays in receiving results in some circumstances, regardless of the relationship between the pathology provider and referrer.

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 can communicate to consumers the benefits of choosing a pathology provider with whom they have an ongoing relationship and whose reporting style they are familiar with. Consumers have indicated they appreciate good quality advice from their medical practitioners. Consumers reported they 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.*

Concern has also been raised by the consumers CHF has consulted with, about the possible lack of *interoperability of electronic reporting systems.* CHF would welcome reassurance, for consumers, that electronic communication between all providers and referrers exists, regardless of the consumers choice of pathology provider.

Possible problems arising due to inconsistent measurement series and reference ranges by different providers.

Throughout CHF's consumer consultations, the issue of variability of equipment between collection points was raised as being a possible influence on consumer choice. An example of this was of machinery from different laboratories providing results in different formats. This leads to confusion for consumers when they attend a collection point that is not their regular one and receive a result that appears vastly different.

Increased choice of provider will enable consumers to find a collection centre that suits their needs and preferences. However, as highlighted above, it is imperative that the consumer and their requesting practitioner discuss this issue. If consumers are seen as partners in decision making and are well informed about variability of measurement series and reference ranges, they are more likely to see the benefits of using one provider over another. Through communication, both consumer and practitioner can make informed decisions together and make more collaborative health decisions.

Potential impacts on arrangements between GPs and pathology providers relating to emergency and out of hours contact.

CHF recognises that there could be problems if a pathologist needs to contact a referring practitioner who they do not know outside of normal business hours or in an emergency. CHF would support strategies put in place to alleviate this issue. An example is a provision being written into the pathology request form that would contain the referring practitioners emergency contact details.

Conclusion

CHF welcomes improvements to increase consumers' choice of pathology provider and hopes that new measures will provide improved safety, quality, efficacy and convenience 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 providing evidence to the committee on this important matter.



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.