Private Health Insurance Consultation - Second Wave Reforms

We are private and public sector psychiatrists working in hospital and community based settings.

We welcome the opportunity to provide feedback on the proposed reforms.

Before specific commentary, we make the following points on process:

- We note the apparent driver for these reforms being the insurance industry, rather than it having origins involving ALL stakeholders, in determining a collaborative plan around the critical issue of the maintenance and growth of a robust and effective private health sector
- The whole stakeholder consultation process occurred during a period dominated by Covid
- This feedback period being during the Christmas holiday period

We trust that these are not indicative of a casual approach to inputs from outside the insurance sector. Those points made, we turn to the issues that we are most concerned with.

Consultation 3

The principles of quality care for those with mental illness and disorder are that services are clinically led, and deliver the right treatment, at the right time, in the right place. We agree with the principle of avoiding unnecessary hospitalisation, where possible.

We assert the primacy of the therapeutic relationship, and its role in continuity of care. These are essential ingredients to good outcomes for those with chronic mental health disorders. It must also be noted that those receiving services in the private hospital setting have moderate to severe mental disorders, requiring sophisticated and coordinated clinical inputs.

Private hospital services adhere to appropriate clinical standards, have clear clinical governance arrangements, with psychiatrists playing a crucial role in leading clinical decision-making. A similarly robust level of clinical governance and responsibility should underlie decisions about out of home hospital care, with clinical care plans, within the multidisciplinary frame, developed by psychiatrists in consultation with consumers, carers and other clinicians, with clear delineation of role responsibilities.

Developing the out of home mental health workforce to include non-clinicians requires the provision of appropriate training and education standards, and accreditation processes. Such workers should only provide services in the context of the multidisciplinary care plan, developed under the direction of the treating psychiatrist and other senior clinicians.

The decisions, then, about clinical care, must always be made by clinicians. The situation where insurers are in the position of making clinical care decisions must never occur, and would threaten the integrity of the PHI sector.

Conclusion

We welcome reforms to bolster the sector and expand its scope. That said, implementing reforms must have protections built in to ensure the following:

- decisions about out of hospital clinical care needs remains the responsibility of the treating psychiatrist
- Insurers never being decision-makers about clinical care requirements.
- expansion of the MH workforce to non-clinicians should not occur without the development of appropriate standards and accreditation processes.

And a final point about the vertical integration that is occurring in the PHI sector. The obvious concern is with insurers only purchasing products that they own, heralding managed care type arrangements, which would spell the end of the extraordinarily successful PHI sector. The sector's success is built on the capacity of consumers to choose their treating clinicians, the therapeutic relationship between them and the primacy of clinicians as clinical decision makers.

Angelo Virgona (NSW) 8 February 2021

on behalf of:

Victoria
Dr Fariba Ahmadi
Dr Joel Aizenstros
A/Prof Saji Damodaran
Dr Jillian Devlin
Dr Vivienne Elton
Prof Paul Fitzgerald
Dr Karen Gaunson
Dr Dianne Grocott
Dr Corinne Haber
Dr Melinda Hill
Prof Mal Hopwood
Dr Najmeh Jadidi
Dr Peter Jenkins
Dr Negibe Mankir
Dr Bill Pring
Dr Hemlata Ranga
Dr Moghamad Cassim Schrueder
Dr Carol Silberberg
Dr Tanya Stavovy
Dr Arun Subramaniam
Dr Glenn Sutcliffe
Dr Anna Takacs
Dr Surya Tipirneni

Dr Astha Tomar
Dr Ashis Vikas
Prof Mark Walterfang
Dr Amit Zutshi

NSW
Dr Ghada Abdelbaky
Dr Mohita Abrol
Dr Ifti Ahmed
Dr Dhyan Amano
Dr Jagadeesh Andepalli
Prof Marie-Paule Austin
A/Prof John Basson
Dr Dinah Bennett
Dr Rahul Bharadwaj
Dr Yajuvendra Bisht
Dr Chris Blackwell
Dr Michael Bull
Dr Dillon Cheah
Dr Raj Choudhary
Dr Sandra Choy
Dr Judith Craig
Dr Mark Cross
Dr Paul Cullen
Dr Jennifer Dancer
Dr Gordon Davies
Dr Tristram Duncan
Dr Alice Dwyer
Dr Catherine Faehrmann
Dr Gary Galambos
Dr Tatiana Grosman
A/Prof Newman Harris
Dr James Heiner
Dr Ralf Ilchef
Dr Anila Jacob
Dr Rajeev Jairam
Dr Jacquie Kaelle
Dr Sujatha Kalava
Dr John Kasinathan
Dr Arvind Kendurker
Dr Victoria Kim
Dr Lana Kossoff
Dr Varad Kumar
Dr Sharat Lal
Dr Samuel Lim
Prof Colleen Loo
A/Prof Sloane Madden
Dr Nabil Malik
Dr Dale Marchant
Dr Linton Meagher
Prof Phil Mitchell

Dr Karthik Modem
Dr Abi Nagesh
Dr Alex Nash
A/Prof Louise Nash
Dr Mahendra Nepal
Dr Tom Newlyn
Dr Nick O'Connor
Dr Sian Ong
Dr Irwin Pakula
Dr Seema Padencheri
Dr Paresh Ramjee
Dr Ratna Ratna
Dr Marie Shaw
Dr Nahid Siddiqui
Dr Rajneesh Singh
Dr Yolisha Singh
Dr Eddie So
Dr Sujaya Sringeri
Dr David Ward
Dr Kathy Watson
Dr Alan Weiss
Dr Karen Williams

SA
Dr Michelle Atchison
Dr Natasha Chow
Prof Cherrie Galletly
Dr Julia Hanna
Dr Tom Patterson
Dr Dan Short

Qld
Dr Agnew Alexander
Dr Anastasia Braun
Dr Curt Gray
A/Prof Satish Karunakaran
Prof Philip Morris
Dr Babatunde Olarinde
Dr Lynne Steele
Dr Jon Steinberg

ACT
Dr Suneel Chamoli
Dr Joey Le
Dr Alex Lim

WA
Dr Lakshmi Fernandes
Dr Lisa Miller
Dr Brian Power