

8 February 2021

Private Health Insurance Branch
Department of Health
GPO Box 9848
Canberra ACT 2601

By email: phiconsultation@health.gov.au

Dear Mr Paul McBride

Consultation paper: Private health insurance reforms – second wave – December 2020

The Royal Australian College of General Practitioners (RACGP) thanks the Department of Health (the Department) for the opportunity to provide feedback on the proposed reforms to private health insurance announced in the 2020-21 federal budget.

Our submission specifically addresses reform proposals 2 and 3 – Expanding home and community-based rehabilitation and mental health care.

Proposal 2 – Expanding home and community-based rehabilitation care

As with any increase in the use of community-based healthcare resources, consideration must be given to ensuring that a patient's rehabilitation care is integrated as part of their comprehensive care provided by their regular general practitioner (GP). Any medical practitioner who develops a rehabilitation plan under the proposed model should communicate with the patient's GP to ensure all members of the healthcare team are kept informed of the patient's care arrangements.

GP input to rehabilitation plans is important to a patient's long-term health outcomes, as GPs have a holistic understanding of their care needs and provide ongoing, comprehensive care throughout all life stages. The RACGP welcomes the acknowledgement that GPs are equipped to develop rehabilitation plans under this proposal, as they routinely prepare Medicare-funded care plans for people with chronic diseases and mental health conditions, many of which are complex.

We recommend the Department provide further information or guidance on how this proposed reform will work in the general practice setting; in particular:

- whether patients would be able to nominate their usual GP to prepare and oversee their rehabilitation plan, given the GP's knowledge of their medical history
- who is responsible for reviewing and updating the plan based on a patient's changing care needs
- if the plan is developed by a medical practitioner other than a GP, what mechanisms will be put in place to ensure the patient's GP receives a copy of the plan and is kept informed of their progress, given the patient will likely present to their GP for follow-up and ongoing care following discharge from hospital.

Proposal 3 – Out-of-hospital mental health services

GPs provide evidence-based, patient-centred care to people living with mental health-related issues, and are therefore best able to provide appropriate, tailored and long-term mental health care for their patients. In 2018-19, more than 10% of the population received Medicare Benefits Schedule (MBS) supported mental health specific

care, almost doubling the rate from 10 years earlier. The majority (8.7%) of these services were provided by a GP.¹ Given the central role of GPs in delivering and coordinating mental health services, it is critical that other mental health professionals communicate with a patient's usual GP regarding their mental health status and care needs.

The RACGP welcomes the expansion of preventive mental health services proposed as part of this reform, however we note this must not create an additional burden for GPs in navigating insurance arrangements. It is also imperative that the coordination role of GPs is maintained, and that this does not transfer to the insurer because they are now able to fund a wider range of allied health services.

The RACGP looks forward to contributing to further discussions around reforms to private health insurance. Please contact Ms Leonie Scott, National Manager – Policy and Advocacy, on (03) 8699 0031 or at leonie.scott@racgp.org.au if you have any questions or comments regarding our submission.

Yours sincerely



Dr Karen Price
President

¹ Australian Institute of Health and Welfare. Mental health services in Australia. Canberra: AIHW, 2021. Available at www.aihw.gov.au/reports/mental-health-services/mental-health-services-in-australia [Accessed 29 January 2021].