

**southern**  
**DIVISION of GENERAL PRACTICE**  
**tasmanian**

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File: ORG186



Ms Helen Owens  
Commissioner  
Productivity Commission  
Locked Bag 2  
Collins Street East  
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20 March 2003

Dear Ms Owens

Thank you for the opportunity to comment on the Progress Report of the General Practice Administrative and Compliance Costs Study.

The Board of the Southern Tasmanian Division of General Practice has considered the Report and wishes to lend its support to the RACGP response (March 17 2003) in which the College asserts that the calculation of compliance costs associated with vocational registration should be restricted to reporting time and other activities specific to meeting QA&CPD requirements, rather than time spent actually undertaking educational activities.

We disagree with the Report's treatment of the differential in Medicare rebates between VR and non-VR GPs, as a remuneration for administrative tasks required to maintain VR.

In fact, the higher Medicare rebate acknowledges qualification in general practice as a speciality. The report's assumption that the higher rebate is for administration tasks is akin to assuming that reason for higher rebates for a specialist consultation are solely to reimburse them for similar administration tasks. This is a nonsense.

In this context it should be noted that for non-bulkbilling consultations, the payment of the rebate is to the patient, rather than to the GP. There is no evidence that non-VR doctors' private fees to their patients are less than those of VR doctors. The patient may be more out of pocket and the government may spend more, but the GP's income from the consultation is the same.

The Division notes that the Progress Report does not take into account the burden of Commonwealth accreditation requirements on GPs, for example the flow on effect of increased paperwork through nursing home accreditation requirements to GPs.

I trust that these important issues can be taken into consideration in the Commission's research.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'Annette Douglas'.

Dr Annette Douglas  
Chairman

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