

Professor Stephen King
Commissioner
Human Services Inquiry
Productivity Commission
Locked Bag 2, Collins Street East
Melbourne Vic 8003

19 July 2016

Dear Commissioner,

**Optometry Australia's submission to the Productivity Commission's Issues Paper:
Human Services – Identifying sectors for reform**

Optometry Australia welcomes the opportunity to provide comment to the Productivity Commission's inquiry into potential sector reform within the provision of Human Services.

We note that the Commission has in particular asked for feedback to help identify those human services that might be suited to an increased application of competition, contestability and user choice, and we will focus our response on this issue.

Optometry Australia is the national peak body for the optometry profession, comprising a membership base of close to 90 percent of optometrists registered in Australia. The optometry profession consists of a workforce of over 5,000 registered optometrists, providing services through approximately 2,900 practices nationally. Almost all optometry practices provide clinical services which are rebateable under the Medicare Benefits Schedule (MBS), which is under the responsibility of the Department of Human Services. Optometry Australia is therefore particularly interested in any recommendations or outcomes from this inquiry which may affect the operations of the MBS.

We note that recent discussions during the Federal election highlighted the high level of commitment to the fundamental principles of Medicare among the community and health service providers. Optometry Australia echoes this, and is absolutely committed to protecting the integrity of the Medicare system.

Optometry Australia's view is that if there was to be any consideration, now or in the future, about the extent to which the provision of specific Medicare-related services might be open to review or change, we would be open to supporting such change **only if**:

- it is clearly a cost-effective and appropriate use of government funding, does not increase the cost to government, patients, or health service providers, and does not undermine the fundamental principles of the Medicare system;
- it will improve the efficiency of any existing system and support improved patient outcomes; and
- there is a task force, which includes representation from a wide range of health practitioners and patients, to examine any such proposal, and lead a genuine

process of consultation about that proposed change that specifically elicits wide-ranging feedback from those providing services as well as those using the services in the community.

CHARACTERISTICS OF HEALTH SERVICES AND SUITABILITY FOR REFORM

Optometry Australia would like to draw attention to some specific and important characteristics of health systems and service delivery that we think it would be important to recognise and acknowledge if any reform is being considered.

1. Health service systems have, in effect, two relevant service users

The Productivity Commission emphasises service recipients as a key group for consideration, and asks how reforms might support choice.

We would note that in the provision of health services, the providers of those health services are themselves significant users, whose requirements and needs should also be taken into account.

Among those needs are:

- the ability for health providers to access necessary information about their patients' health, history and medical status quickly, reliably and without impediment; and
- clear and consistent points of reference for obtaining all relevant information to support the health service, including information about billing patients appropriately and efficiently.

2. Health privacy is a transaction and negotiation between health service providers and patients, and not just patients and those who hold health information

Optometrists, as health practitioners, understand how important it is to protect patient privacy and adhere to all legislation that supports this outcome.

That said, health practitioners regularly have a need to access important information from other providers about patients and their health, in a timely fashion.

Optometry Australia would not support reform to health service delivery systems which had the likely effect of making access to the information necessary to provide appropriate clinical care in a timely fashion more difficult or more complex.

We note that complexity in the system is likely to be increased by the addition of multiple and/or competing providers. We encourage the Productivity Commission to be aware that there may well be areas of health service delivery where patient outcomes will not be enhanced or improved by the presence of multiple alternative providers.

3. Consistency of information and timely access to it is necessary for health service providers to support the best health outcomes.

All health practitioners, including optometrists, regularly have the need to seek information from human services agencies to allow them to provide appropriate patient care. That information might include:

- information to support appropriate and correct Medicare billing and charging;
- information related to patients' status and entitlements if they are a health care card holder, Veterans' affairs card holder, or pensioner;
- information relating to a person's needs or circumstances in the community, in such as information about housing or the need for ongoing social support.

Optometry Australia urges that the Productivity Commission be mindful that health practitioners need to retain clear and efficient lines of timely access to that information, within the appropriate constraints of privacy legislation.

We note the potential for complexity to be increased with the addition of multiple service providers, and encourage the Productivity Commission to recognise that some services may in fact be more effectively provided through the one streamlined system, with clear lines of access for health information.

There may also be opportunities to improve the user experience for both health care providers and their patients by improving, strengthening or streamlining the operation of the existing systems, and we strongly encourage the investigation of these options first, in determining what services may be suitable for, in particular, contestability.

4. Government accountability

The Government must remain ultimately and solely accountable for the operation and delivery of all functions under the Department of Human Services, regardless of whether the service provided was by a public or private entity.

Optometry Australia asks that the Productivity Commission consider clear and transparent governance arrangements when assessing whether the provision of any services delivered should be contestable.

There are many instances where the 'blame game' occurs between Government and other service providers, and this is detrimental to achieving good health outcomes.

TASK FORCE AND CONSULTATION

Optometry Australia would be open to supporting proposals to improve efficiency in the delivery of health services only subject to a wide-ranging consultation which includes feedback from health service providers and health service users.

We believe the mechanism to achieve this would be a representative high-level task force specifically established to review and assess any proposed changes, and lead a community consultation.



Optometry Australia would be open to actively contributing to any such task force and consultation process. Should you have any queries regarding our advice, please contact me

Yours sincerely

Genevieve Quilty
National Chief Executive Officer
Optometry Australia