



Human Service Inquiry  
Productivity Commission  
Locked Bag 2  
Collins Street East  
MELBOURNE VIC 8003

## **Submission to the Human Services Inquiry – Identifying Sectors for Reform – Response to Preliminary Findings Report**

Dear Commissioner,

CHA is pleased to respond to the Preliminary Findings Report of the Productivity Commission's Introducing Competition and Informed User Choice in Human Services: Identifying Sectors for Reform.

### **Public Hospitals**

CHA welcomes the Commission's identification of public hospitals as one of the sectors that could be examined further.

CHA agrees with the Commission's observation that Australia's public hospitals perform well in comparison with many other comparable countries. However, as set out in CHA's submission to the first part of this Inquiry (sub 236), the significant expenditure on public hospitals together with large – and often unexplained - variation in costs make a case for further examination of this sector in Stage 2 of the Commission's Inquiry.

Many of CHA's not-for-profit members have a long tradition of providing high quality public hospital services and would welcome the opportunity to contribute further to the provision of public hospital services where it is of benefit to the community. Our members have a particular mission to provide hospital and health services to the most vulnerable.

CHA supports greater provision and transparency of appropriately risk-adjusted performance information. In doing so, we note that the publication of such information often prompts providers to compare their performance with their peers which results in performance improvement – even where consumers themselves do not change provider in response to the provision of performance information.

For example the publication of device performance information by the National Joint Replacement Registry has often prompted suppliers of relatively poorly performing devices to remove their devices from the market even in the absence of a consumer response.

CHA would also support market testing of discrete packages of hospital services.

We note, however, that to be effective such market testing needs to offer a volume of work that makes it worthwhile for providers to spend the necessary time and expense required to prepare a bid. A market offering would also need to cover a reasonable period of time – say a contract length of 5 – 10 years.

Ad-hoc short-term offerings – particularly to clear long elective surgery waiting lists in pre-election periods are unlikely to be the most competitive responses and generally offer little long-term benefit to the community.

The provision of some areas of service provision – particularly services to vulnerable populations such as those with a mental illness, those living in regional areas, indigenous Australians, as well as people with multiple and complex chronic conditions where continuity, collaboration and co-ordination between service providers are required may be less suited to the application of contestability and competition. Certainly the design of any contestability arrangements would need to ensure as far as possible that care to vulnerable groups was not compromised. This could be achieved, for example, by having the payment mechanism cover a bundled range of services and over a multi-year time frame. Key performance and accountability measures should also focus more on outcomes rather than just outputs or process measures.

CHA considers that it is not clear to what extent it is possible to offer public patients a choice of provider – particularly in regional areas. The public hospital system currently faces significant challenges to meet the reasonable access expectations of the public. Offering choice of provider will certainly complicate the provision of services and could exacerbate existing access challenges in some locations. We also note that offering choice of provider may risk undermining one of the key benefits of private health insurance – which could ultimately lead to adding further demand on the public hospital system.

### **Specialist palliative care**

CHA agrees that there is huge variability in the delivery of palliative care services across the country and that those living in rural and remote areas are likely to find it much more difficult to access specialised palliative care services. This is particularly relevant for remote indigenous communities. In order to attempt to fill some of these gaps, one of our members (St Vincents Health Australia) are funding a demonstration project which will tailor palliative care services that are culturally appropriate to the communities located in the Northern Peninsula Area (NPA), Cape York, Queensland.

Catholic Health Australia service providers have helped lead the way in palliative care and the establishment of hospices. However, funding through the private health insurance system provides only limited cover for specialised palliative care services. Accordingly, many of our members have been obliged to pursue diverse funding agreements with public funders in order to provide a service which is seen as being central to the Catholic ethos in the provision of healthcare.

Some of our members are however trialling new palliative care models with health funds for their members notwithstanding funding limitations.

CHA agrees that the lack of data available on palliative care service provision requires improvement. We also recognise that the standards put in place are robust for such a new speciality.

CHA is particularly concerned about increasing access to palliative care services - as many Australians are unable to access any palliative care at all. We therefore would emphasise the need to review and improve the funding available for the provision of palliative care services; and the need to collect better data in this area before introducing more competition and contestability in this field.

## **Human Services in remote Indigenous communities**

Apunipima Cape York health Council in north Queensland and CHA have begun a journey of collaborating together towards achieving the goal of closing the substantial gaps in health outcomes between Aboriginal people in Cape York and other non-Indigenous Australians.

As such we have visited some of these remote communities and spoken to clinicians, health workers, council members and community members about the difficulties that they face delivering services in these remote communities. Major issues raised are the multiple agencies that deliver health services to one community however with little or no co-ordination nor communication. The uncertainty of government funding and its short-term and temporary nature means that often successful programs can be ceased and new programs began without consulting the community. The nature of funding by program also means that there are significant gaps: for example, lack of funding streams for allied health staff and services is a major problem.

CHA also seeks to support Apunipima in their advocacy work both with the Commonwealth government and politicians to promote awareness of the challenges faced in delivering culturally appropriate, comprehensive and fully financed primary healthcare to the communities of Cape York.

As such CHA is very supportive of the Commission undertaking further work in this area as part of Stage 2 of the Inquiry and strongly supports the recommendations outlined in the preliminary findings overview:

- Improve the quality of services by providing them in a more culturally appropriate way (this will require extended consultation with communities and community-controlled services);
- Better co-ordination of services (less agencies and better communication between agencies);
- Place-based service models and a greater community voice in service design and delivery (delivery of services wherever possible close to home after extensive local consultation); and
- More stable policy settings and clearer lines of responsibility could increase governments' accountability (stable funding mechanisms and better evaluation of programs).

CHA looks forward to contributing to the next stage of the Inquiry.

*Catholic Health Australia*  
*October 27<sup>th</sup> 2016*