

Friday, 11 October 2019

Dear Health Data Legislation Team,

QAIHC thanks the Department of Health (DoH) for the opportunity to respond to the *Health Legislation Amendment (Data-Matching) Bill 2019 and Associated Regulations* consultation. The purpose of this letter is to provide feedback on the proposed Bill in line with the published Consultation Guide.

QAIHC is the peak body representing our Member Services, the 28 Aboriginal and Torres Strait Islander Community Controlled Health Organisations (ATSI CCHOs) in Queensland, at both a state and national level.

QAIHC supports the DoH's work in detecting fraudulent and incorrect claiming, in order to ensure Medicare compliance and sustainability. Medicare is one of the ATSI CCHOs' crucial funding sources, therefore its sustainability is vital to reducing the health inequality that exists in Australia for Aboriginal and Torres Strait Islander peoples.

QAIHC and its Member Services take Medicare compliance seriously. ATSI CCHOs undertake continuous quality improvement activities and regularly analyse Medicare Benefit Scheme (MBS) performance through data reports and audits to drive clinical improvements.

ATSI CCHOs operate under a family centred holistic Model of Care. This means patients receive services in a comprehensive primary health care environment with follow-up Medicare services being undertaken in line with national recommendations. This generally differs from mainstream primary health care (PHC) provision and Member Service feedback is that many mainstream PHC providers do not understand the requirements behind Aboriginal and Torres Strait Islander specific MBS items. For example, the MBS item 715 (Aboriginal and Torres Strait Islander Health Check) should be associated with follow up care items (such as MBS item 10987 or 81300). Too often follow up items are not addressed by mainstream PHC clinics which means ATSI CCHOs have to provide that service but are not able to claim for it.

Activities that support increased compliance of mainstream PHC providers, particularly when providing Aboriginal and Torres Strait Islander specific MBS items, are supported by the ATSI CCHO sector.

The national team of Medicare Liaison Officers (MLOs) that exists to support ATSI CCHOs and others claiming Aboriginal and Torres Strait Islander health MBS items consists of only eight staff. The support is not sufficient to the number of ATSI CCHOs nationally (145).

It is due to this workforce shortage that QAIHC allocates core funding to employ a full time Workforce Coordinator (Chronic Disease & Medicare) who provides Medicare compliance, claiming advice and training to all QAIHC Member Services. This support provides significant value in ensuring Medicare compliance and maximising Medicare claiming opportunities for the sector. Most importantly it assists with the effective completion of care cycles for Aboriginal and Torres Strait Islander patients. QAIHC also supports Member Services by analysing MBS data and supporting their CQI processes.

With this proposed Bill's greater scrutiny comes a higher compliance standard which needs to be matched by greater resources. On 19 December 2018, QAIHC submitted a funding proposal to the DoH to expand QAIHC services, maximising ATSI CCHOs' opportunities to fully and legitimately claim Medicare income by:

- Increasing on-site Medicare item support including compliance, systems and process development;
- Increasing opportunities for Member Services to access Medicare and other billing-related training and education;
- Creating stronger linkages between Member Services and Medicare (Department of Human Services (DHS)) to reduce Medicare rejections and promote information sharing;

This application was not supported by the DoH.

QAIHC supports the DoH's Medicare compliance programme as part of ensuring the long-term sustainability of Medicare, and appreciate the intent behind this proposed Bill. To compliment the need for greater compliance, QAIHC recommends that the DoH re-consider the funding proposal to strengthen compliance support for ATSI CCHOs within Queensland.

Yours Sincerely,



**Neil Willmet**  
Chief Executive Officer  
Queensland Aboriginal and Islander  
Health Council Brisbane