

11 October 2024

MBS Health Assessment Items Review Consultation

Department of Health and Aged Care

E: MBSHealthAssessmentReview@health.gov.au

RE: MBS Health Assessment Items Review Consultation

Thank you for the opportunity to contribute to the MBS Health Assessment Items Review Consultation.

For more than 70 years, the Australian Healthcare and Hospitals Association (AHHA) has been the national voice for public healthcare. Our vision is for a healthy Australia, supported by the best possible healthcare system.

Our membership represents a diverse cross-section of the system including public and not-for-profit hospitals, Primary Health Networks, community, and primary healthcare services.

Our work with members is underpinned by our [blueprint for outcomes-focused, value-based healthcare](#). Supported by our research arm, the [Deeble Institute for Health Policy Research](#), and the [Australian Centre for Value-Based Health Care](#), we research, educate, advocate, and collaborate to achieve an outcomes-focused and value-based health care system for healthy Australians.

To modernise health assessment items to strengthen care continuity and preventive intervention, AHHA recommends a combination of the three options outlined in the discussion paper. We also recommend planning and implementation that includes:

1. A focus on the **value** that health assessment items can provide to people and communities in outcomes, **rather than volume** of services provided.
2. Making the best use of the **available workforce** to provide health assessments to people who will benefit from them.
3. Going beyond **prescriptive approaches to incentivise uptake** of health assessment items.
4. The mobilisation of **data and technology** in the delivery of, and access to, health assessment items – particularly for those in rural and remote areas.

AHHA supports proposals from across the three options that are:

Evidence-based

- Regular review of efficacy and effectiveness of primary care assessments and interventions on the MBS as Australia's burden of disease continues to evolve, together with changes to society, technology and the health workforce.
- Removal of components where there is limited or uncertain evidence that routine assessment contributes to better prevention, earlier intervention, or improved patient outcomes.
- A system that proactively identifies gaps in published research and takes steps to strengthen the evidence-base for preventative care and early intervention in primary care.

Value-based

- Changes that would ensure that MBS items reflect current best practice in the modern healthcare context. We also support the Department's willingness to consider a radical restructure if necessary to achieve this.
- A system that incentivises better outcomes for patients by measuring outcomes. It is important not to proliferate the idea that increased volume of assessments and treatment plans automatically equates to better outcomes.
- Effective use of available health workforce by supporting health professionals to work to their full scope of practice - especially where this would improve accessibility for priority populations - while taking any necessary steps to mitigate risks to quality and safety of care.

Accessible and equitable

- Approaches that strengthen continuity of care, while ensuring equitable access to primary care services for all Australians, regardless of their individual circumstances. In considering whether to link assessments to MyMedicare it is important to ensure that assessment will be available to all people who would benefit from them.

Sustainable

- A system that provides fair reimbursement to GPs and other primary care providers, and incentivises evidence-based, person-centred assessments and interventions that reduce burdens on the health system and provide better outcomes.
- Updates to MBS assessments are supported by wider system reforms to modernise the health system and strengthen primary care.

AHHA is committed to supporting reforms to the MBS health assessment items that align with our vision for a high-quality, outcomes-focused, and sustainable healthcare system. By focusing on evidence-based, value-driven, and equitable approaches, Australia can better address the evolving needs of its population. It is essential to prioritise patient outcomes, make full use of the healthcare workforce, and ensure that care is accessible to all Australians.

To discuss any aspect of this response further please contact Angela Wicks, Policy Director at awicks@ahha.asn.au.

You can also visit our [website](#) to learn more about our work.

Yours sincerely



Kylie Woolcock
Chief Executive
Australian Healthcare and Hospitals Association (AHHA)