

By email: [IntegrityReview2023@Health.gov.au](mailto:IntegrityReview2023@Health.gov.au)

Dear Dr Philip

Thank you for the opportunity to meet with you recently as part of your Medicare Integrity Review, and your kind offer to receive follow-up from our discussions.

I would like to briefly confirm Avant's experiences and position on Medicare integrity.

### **Our members' experience of Medicare**

It is our strongly held view that the rules and regulations around Medicare are very complex and can be unclear and confusing to doctors trying to comply with them. This complexity has grown markedly since the start of the pandemic, and frequently causes uncertainty and anxiety for practitioners and practices.

As part of our continuing program of educational support, we surveyed our members in September 2022 about their views on various aspects of the Medicare system. Some key findings of the survey completed by over 1,500 doctors, are as follows:

- Just over half of surveyed members (54%) agreed that they knew where to find information they required about Medicare billing.
- Less than half (49%) felt they understood Medicare's billing requirements
- Only 25% agreed that if they received a compliance letter from Medicare they would know where to look for information to assess the situation
- Six out of 10 members would not feel confident in dealing with a Medicare compliance activity.

These results suggest that the source of most Medicare non-compliance is inadvertent and results from unclear sources of information. This is consistent with Avant's experience in supporting doctors through Medicare compliance activities where we find the overwhelming majority of doctors are trying to claim correctly.

### **The need for effective education**

There is a strong need for clear and unambiguous information being made available to Medicare providers. This is confirmed in the survey findings. The absence of approved education courses for practitioners results in doctors learning billing practices from other sources, which may be less reliable. Certain groups are particularly impressionable and vulnerable to these other sources of advice, including overseas trained doctors and early career doctors in isolated settings.

While we acknowledge existing efforts by the Department to provide practitioners with education and advice, this is sometimes unclear. The advice from the Ask MBS service was particularly noted by our members as often circular and without providing clear guidance.

There is a need for comprehensive education that is evaluated for its effectiveness in preventing non-compliance. It is important that education is appropriately used to support compliance, rather than waiting for non-compliance to occur. Education is often not seen to be given the same weight as more punitive compliance activities within Medicare.

### **Complexity of item numbers can be confusing and lead to under-claiming**

As I described in our meeting through the examples of ante-natal visits and the differences between mental health and physical health consultations, complexities or inconsistencies within Medicare create anxiety and confusion for providers. In our experience this most commonly leads to under-claiming of services, lowering patient subsidies and worsening financial viability of practices.

### **Health and wellbeing of practitioners**

Medicare compliance activities cause significant stress to many practitioners wherever they are involved on the “compliance pyramid”. It is important that resources are dedicated to understanding the practitioner’s experience and how to minimise stress throughout the processes. This is particularly the case for communications processes with doctors.

### **The scale of non-compliance**

We have not seen of high levels of non-compliance (up to \$8 billion) as implied in media reports. This media commentary has concerned many of our members, who feel unfairly criticised while attempting to comply with a complex system. We would support the development of a transparent methodology that allows those using and paying for Medicare to have a common understanding of compliance so that activities and interventions can be more accurately targeted.

Thank you again for the opportunity to contribute to your review. I would be happy to discuss any of the points raised with you further by email or telephone.

Kind regards

Dr Michael Wright

**Chief Medical Officer**  
Avant Mutual