



2 August 2018

Submitted by email to: [PHIconsultation@health.gov.au](mailto:PHIconsultation@health.gov.au)

**Re: Release of Exposure Draft subordinate legislation Private Health Insurance (Reforms) Amendment Rules 2018**

The Australasian College for Emergency Medicine (ACEM) is the not-for-profit organisation in Australia and New Zealand responsible for training and educating emergency physicians and advancing professional standards in emergency medicine. We write in response to the invitation from the Hon Greg Hunt MP, to provide comment on the exposure draft of the Private Health Insurance (Reforms) Amendment Rules 2018 (the Rules). In light of the short consultation period, we would like to request a further period of six to eight weeks to consider the proposed reforms. This would enable consultation with members of the college who have an interest in private health insurance but have not had enough notice to prepare a comprehensive and considered response to this complex set of reforms.

In the meantime, our brief submission is narrowly focused on the proposed measure regarding patient information.

Private EDs are important components of acute health care systems. They provide patients with access to specialised, quality care from staff that are undertaking, or have undertaken, significant specialist training. Patients with private health insurance must be provided with information that clearly articulates what service of care is and is not covered under their policy. In support of greater patient choice and informed decision making, ACEM considers that government and private health insurers can do more to facilitate and communicate options available to patients about their care choices and ACEM supports efforts to achieve this. To assist patients to make an informed choice, private health insurers are encouraged to provide materials to their customers that clearly articulate the services that are covered under their PHI, both in public and private hospital settings, and the cost of these.

We therefore support the proposed changes regarding private health information statements and the upgrades to the private health insurance ombudsman website. In addition we recommend public awareness campaigns as a useful approach to inform the public of their options, including their right to request treatment in a private ED where appropriate. These measures will go some way towards addressing concerns regarding consumers' access to information about their private health insurance that is easy to understand and apply, including when they present to private emergency department.

For your information, please find attached a copy of our Statement on the role of private hospital emergency departments. For further information, please do not hesitate to contact Helena Maher, Manager Policy and Advocacy, on [helena.maher@acem.org.au](mailto:helena.maher@acem.org.au) or by calling 03 9320 0423.



Dr Simon Judkins  
President



Dr Michael Ben Meir  
Chair Private Practice committee

Attachment: Statement on the role of private hospital emergency departments