

Given that the remit of the PSR includes dentists providing services that attract a Medicare rebate, the Australian Dental Association supports the proposed amendments to :remove the veto power of the Australian Medical Association, known as the AMA, in the appointment process of the director of the PSR, as this will better support further proposed amendments including the consultation requirements for appointments of other statutory office holders of the PSR, including deputy directors, panel members and members of the determining authority, to enable consultation with relevant peak bodies directly and enable the appointment of associate directors of the PSR.

We do however have some concerns about the removal of the need for engagement with stakeholder groups about documents relevant to substantiating Medicare payments, as a prerequisite for issuing a notice to produce documents during an audit. The breadth of understanding as they related to different areas of practice will not be well understood by the PSR or the staff assisting them in the audit process and for that reason, we believe seeking input from the relevant professional body would be of assistance. Any concerns about this process delaying Medicare compliance functions could surely be mitigated through adequate communication.

We hope that the Committee will take these comments into consideration. Please do not hesitate to reach out to me directly should you have any further questions.

Kind regards

[Eithne Irving](#)

Deputy CEO

GM | Advocacy, Media & Professional Services  
Australian Dental Association