

24 March 2026



Health Legislation Amendment (Improving Choice and Transparency for Private Health Consumers) Bill 2026

Dear Senate Community Affairs Legislation Committee

Breast Cancer Network Australia (BCNA) is Australia's leading breast cancer consumer organisation with a network of over 250,000 people. For more than 25 years, we have advocated for, connected, supported, and informed people affected by breast cancer to ensure they receive access to the care, treatment, and advice they need. As a trusted delivery partner for the Australian Government, BCNA is funded to provide specialist support services through the Australian Cancer Nursing and Navigation Program (ACNNP) and the Seat At The Table Consumer Representative program.

We welcome the opportunity to provide a submission to the Senate Community Affairs Legislation Committee's inquiry into the Health Legislation Amendment (Improving Choice and Transparency for Private Health Consumers) Bill 2026. The Bill supports BCNA's long-standing priorities to reduce financial burdens on people affected by breast cancer, reinforced each year in our Policy and Advocacy Strategy actions. Several BCNA reports in the last ten years have demonstrated the lack of transparency about specialists' fees as an ongoing barrier to timely and equitable breast cancer care for privately insured consumers who experienced out-of-pocket costs between \$5,000 to \$21,000. For example, BCNA's *Financial Impact of Breast Cancer* in 2017, *State of the Nation* in 2018, and *Breast Reconstruction in Australia* in 2021. More recent anecdotal consumer feedback suggests these costs have nearly doubled, now ranging from \$50,000 to \$80,000. Experiences of BCNA members are consistent with data published by Private Healthcare Australia in its 2026 report such as patients not knowing their specialist fee before their appointment, receiving unexpected invoices for payment, and delaying or cancelling specialist care due to cost.

We strongly support the amendments proposed in the Bill. Introducing compulsory publication of specialist fee and out-of-pocket cost data on the Medical Costs Finder (MCF) is a necessary and long-overdue reform. For the first time, access to actual fee data will allow patients and their GPs to compare specialist costs before committing to private healthcare pathways. This is a critical care decision for a person diagnosed with breast cancer who often faces a complex, multi-disciplinary and non-linear treatment journey involving several specialists such as surgeons, assistant surgeons, medical oncologists, radiation oncologists, reconstructive surgeons, anaesthetists and pathologists, as well as allied health professionals. Treatment can extend over several years, requiring ongoing specialist coordination and care. Over 20,000 Australians estimated to be living with metastatic breast cancer, also referred to as stage 4 or advanced, require specialist care for the rest of their lives.

While the focus of our submission relates to proposed changes to the MCF, we also support the anti-phoenixing provisions set out in the Bill. Top-level hospital policies are most relevant to breast cancer patients requiring surgery, chemotherapy and reconstruction. We note the Commonwealth Ombudsman identified this tier was most affected by the practice of relaunching near-identical products at premium increases. With over 21,000 Australians being diagnosed with breast cancer each year, closing this loophole promotes integrity and consumer confidence in the private health system.

Equitable access to specialist care

Breast cancer affects people of all ages, backgrounds and locations. The widening disparity in access to specialist care is a serious and growing concern. We acknowledge the Bill's intention to create more choice in specialist provider and its recognition of vulnerable population groups including people in regional and remote areas, those with lower incomes, and those managing ongoing or complex conditions such as people living with metastatic breast cancer. However, these policy outcomes are not achievable for some people. For BCNA members in rural and regional communities who already face reduced access to breast and reconstructive surgeons regardless of cost, fee transparency alone will not create affordable alternatives where none exist.

SUPPORTING AUSTRALIANS AFFECTED BY BREAST CANCER

293 Camberwell Road Camberwell VIC 3124

1800 500 258 (03) 9805 2500 beacon@bcna.org.au www.bcna.org.au ABN 16 087 937 531

We recommend the Bill be communicated as the first step in a broader reform agenda, and that Government will commit to monitoring whether the equity in specialist access is improving or worsening following implementation. We note and support the direction of suggested amendments proposed by Dr Monique Ryan MP to establish clear mechanisms to monitor the impact of the Bill and communicate those impacts publicly. For example, annual reporting to Parliament about effects on out-of-pocket costs, specialist access, geographic equity, and consumer awareness and use of the portal.

Consumer information and informed decision-making

We acknowledge and support the Bill's policy intent to provide consumers with greater capacity to make financially informed decisions, consistent with the Australian Medical Association's principle of informed financial consent. Being proactively informed about the full costs of care at the point of referral will support consumers to confidently engage in shared decisions about their medical treatment and specialist providers. But giving effect to the principles of informed financial consent requires information to be timely, clear, accessible, and presented in a form people can understand.

Further, newly diagnosed breast cancer patients are generally in a state of heightened stress and distress when they are being referred to specialists, and do not always have capacity to seek out alternative specialists when faced with urgent medical care. BCNA urges the Government to ensure the portal is redesigned with consumers to so that it meets information needs of diverse community groups and is targeted to different levels of digital and health literacy. For example, search functionality that reflects plain English diagnoses and procedure descriptions, translated content for people from culturally and linguistically diverse backgrounds, and accessible formats for people with disability.

Accuracy and accountability

BCNA accepts that the Bill does not prescribe in detail what information is published, and we support this flexibility. However, flexibility must be accompanied by active consumer consultation. The type of data published on the MCF should not be determined by the Department alone – it should instead be guided by what information consumers need to support informed decision-making. To sustain public trust in the MCF, published data must be regularly updated with changes to medical costs and to reflect the changing information needs of consumers. BCNA recommends the Government commit to regular data reviews to ensure treatment decisions are based on current information, and that healthcare professionals are held to expectations of accuracy and accountability.

A critical gap in the Bill's current scope is the invisibility of costs associated with a procedure beyond the primary specialist's fee. The proposed amendments do not reflect the complexity of medical care for consumers with serious conditions such as cancer. Booking fees, follow-up appointments, pathology, radiology, anaesthesia and assistant surgeon fees are frequently not known to patients at referral, yet there can be substantial costs, particularly for breast cancer patients where multiple bills are generated for one episode of care, such as breast cancer surgery. BCNA recommends the portal clearly communicate that published figures are estimates only, not quotes, and that they do not capture all costs associated with care. Messaging should direct consumers to discuss the full cost of their treatment with their GP and specialist before proceeding and should identify the specific categories of costs not reflected in the published data. This is essential to managing consumer expectations and reducing further bill shock.

BCNA acknowledges findings from Private Healthcare Australia's report that an absence of information about quality or outcomes, such as complication rates, patient-rated experiences, or clinical outcomes, will continue to encourage price-based selection of specialists rather than value-based care. Future iterations of the MCF should include broader data sets to facilitate consumer choices based on quality and safety as well as cost.

Navigation and education

Education and proactive navigation support is essential to making the MCF an accessible decision-making tool. Consumers need to understand what the MCF offers and how to use it to inform decisions about public and private healthcare pathways and to engage effectively with their insurer. GPs, as the key point of contact for consumers, also need to be aware of the portal and how to use it together with their patients. Investment in advertising and marketing should be targeted to raising awareness about the portal for both GPs and consumers through channels that reach people at the point of referral. Education about the MCF also needs to be aligned and integrated with other cancer care initiatives such as the Australian Cancer Nursing and Navigation Program (ACNNP).

In summary, BCNA commends the Government for progressing the Health Legislation Amendment (Improving Choice and Transparency for Private Health Consumers) Bill and we support its passage into legislation. It represents a welcome and important legislative reform that will, for the first time, give Australians reliable access to specialist fee information before they commit to care decisions. For people affected by breast cancer, who navigate a complex, multi-specialist and financially unpredictable treatment pathway, this reform has the potential to reduce financial toxicity, support earlier and more equitable access to care, and strengthen the practical value of private health insurance.

Recognising the significant investment that has already been made in the MCF portal, the next phase of redevelopment must be designed in partnership with consumers as the primary end-users. BCNA has continued to assist the Australian Government with the establishment and review of the MCF over the past six years as part of our broader advocacy to reduce financial impacts for consumers. Further, our long-term funding partnership to deliver the Seat At The Table (SATT) program recognises the Government's confidence in our consumer leadership expertise. We would therefore welcome a formal role in the portal's redesign, implementation, and ongoing review and evaluation. We also encourage the involvement of healthcare professionals, particularly GPs, to be engaged in the portal's redesign and monitoring due to their central role in supporting consumer decision making and directing them to the MCF at the point of making referrals.

We look forward to the implementation of these important reforms and to contributing informed consumer voices to that process.

Yours sincerely,

Vicki Durston
Director, Policy, Advocacy & Support Services
Breast Cancer Network Australia

Key references:

- Australian Medical Association (2024, October). *Informed Financial Consent Guide*. Available at: www.ama.com.au
- Breadon, P., Geraghty, J., Jones, D., and Baldwin, E. (2025). *Special treatment: Improving Australians' access to specialist care*. Grattan Institute.
- Breast Cancer Network Australia (2017). *Financial Impact of Breast Cancer*. Prepared in partnership with Deloitte Access Economics. Available at: www.bcna.org.au
- Breast Cancer Network Australia (2018). *State of the Nation: Experiences and Concerns of People with Breast Cancer*. Available at: www.bcna.org.au
- Breast Cancer Network Australia and Deakin University (2021). *Breast Reconstruction in Australia: A Report on the Experiences of People Affected by Breast Cancer*. Available at: www.bcna.org.au
- Private Healthcare Australia (2026, February). *Restoring Affordable Access to Specialist Care in Australia*. Available at: www.privatehealthcareaustralia.org.au