



12 April 2012

Senate Finance and Public Administration Committees
PO Box 6100
Parliament House
CANBERRA ACT 2601

Dear Sir/Madam,

Health Insurance (Dental Services) Bill 2012 [No. 2]

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a submission on the *Health Insurance (Dental Services) Bill 2012 [No. 2]* (the Bill), which was referred to the Finance and Public Administration Legislation Committee for inquiry and report on 22 March 2012.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

In our view, this Bill highlights the importance of dentists knowing the specific and detailed requirements under which health professionals can claim for payments for services under Medicare, and the potentially negative effects for them, and for health consumers, if these requirements are not met.

The Bill also highlights the need to have proper systems in place to detect at an early stage if dentists are meeting the requirements of proper Medicare claim procedures. This is particularly important for health professionals who are new to the Medicare process. In this way, early detection can help to ensure that any non-compliance can be addressed as soon as possible.

CHF notes that Medicare has stated it provided information and opportunities to educate dentists by way of official correspondence and resource material. However, given that the audit process revealed a high proportion of dentists who were found to be non-compliant, it is reasonable to infer that Medicare advisory efforts were insufficient to provide dentists with the information necessary to ensure they complied with *all* the requirements under the legislation.

According to official estimates, there are now 11,375 dental providers participating in the Chronic Disease Dental Scheme. We acknowledge that for dentists, as a separate and distinct group of health professionals, this would be their first significant engagement with the claim procedures and requirements of the Medicare system.

We think it is important that the Senate Committee Inquiry be used as a platform to clarify and define the level of support necessary for health professions engaging with Medicare for the first time, with a view to improved outcomes in the future. CHF consumer consultations have reinforced the need for more opportunities to include health professionals such as dentists and allied health professionals under the Medicare system, in recognition of the important role they play in health and wellbeing outcomes. Accordingly, the lessons learned from this Senate Committee Inquiry would be useful for this purpose.

CHF supports the sanction of health professionals found to be committing *intentional* fraud or to have deliberately disregarded legislative requirements, as we recognise that inappropriate use of taxpayer-funded services is detrimental to consumers. However, given that the business and professional reputation of a doctor, dentist or any other health professional is at risk, there should be clear and unequivocal evidence of intentionally fraudulent behaviour. We are concerned by recent media reports suggesting that dentists acting in good faith now perceive that they are being persecuted by Medicare actions. The media reports suggest that fear of bankruptcy or closure of dental practices are real concerns for some dentists who are required to repay the Medicare benefits for their services. In particular, we are concerned this may prove to be a disincentive to their future involvement in government programs, particularly given the current shortage of dentists and the unmet demand for their services.

Finally, the Bill highlights the large and growing need for dental services. CHF welcomes the fact that under the Chronic Disease Dental Scheme 784,198 patients were able to access much-needed dental services, resulting in an overall improvement in their health and wellbeing.

We welcome the opportunity to provide input into this Inquiry and we look forward to reviewing the Committee's report on this issue.

Yours sincerely,

Carol Bennett
CHIEF EXECUTIVE OFFICER