



6 September 2019

Committee Secretary  
Community Affairs Legislation Committee  
Senate Standing Committees on Community Affairs

*Submitted via email: community.affairs.sen@aph.gov.au*

To whom it may concern

**Re: Inquiry into the Australian Institute of Health and Welfare Amendment (Assisted Reproductive Treatment Statistics) Bill 2019**

The Australian Healthcare and Hospitals Association (AHHA) welcomes the opportunity to provide a submission in response to the *Australian Institute of Health and Welfare Amendment (Assisted Reproductive Treatment Statistics) Bill 2019*.

AHHA is Australia's national peak body for public hospitals and healthcare providers. Our membership includes state health departments, Local Hospital Networks (LHNs) and public hospitals, community health services, Primary Health Networks (PHNs) and primary healthcare providers, aged care providers, universities, individual health professionals and academics. As such, we are uniquely placed to be an independent, national voice for universal high-quality healthcare to benefit the whole community.

AHHA has developed a plan to transition the Australian healthcare system to a patient centred, outcomes focused and value-based healthcare system. *Health people, healthy systems*<sup>1</sup> identifies four domains of reform that are critical to achieving this goal. These include reforms to governance structures, performance information and reporting that is fit for purpose, health workforce and funding arrangements. The plan is underpinned by key concepts that include universal health care, quality health outcomes, a holistic view of health and wellbeing, coordinated and integrated care, long-term sustainable funding, innovation in response to need and equity in health.

To pursue a value-based approach to healthcare, information is required on both the outcomes that matter to patients and the costs of achieving those outcomes for a full cycle of care.

Within this context, AHHA submits the following comments on the *Australian Institute of Health and Welfare Amendment (Assisted Reproductive Treatment Statistics) Bill 2019*.

**19A Accredited ART centres must give certain statistical information to the Institute**

- AHHA supports that accredited ART centres be required to give certain statistical information to the Australian Institute of Health and Welfare
- AHHA supports that the chief executive of the centre be held liable if this is contravened. However, AHHA does not support 'strict liability' as this leads to liability regardless of fault. Rather, liability for contravention should be associated with intentional, reckless or negligent actions.

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<sup>1</sup> Australian Healthcare and Hospitals Association. 2017. Healthy people, healthy systems. Available at [https://ahha.asn.au/sites/default/files/docs/policy-issue/ahha\\_blueprint\\_2017\\_0.pdf](https://ahha.asn.au/sites/default/files/docs/policy-issue/ahha_blueprint_2017_0.pdf).

- AHHA supports the statistical information listed, acknowledging that other statistical information may be specified in the regulations. AHHA recommends that:
  - Statistical information on outcomes include pregnancies, live births, perinatal outcomes of babies and assisted reproductive treatment complications
  - Statistical information on outcomes (including pregnancies, live births, perinatal outcomes of babies and assisted reproductive treatment complications) be disaggregated and reported by assisted reproductive treatment type and by age of women
  - Statistical information includes fees charged by assisted reproductive treatment type for a completed cycle of treatment (average and range), including disaggregation by bulk-billed services, non-bulk billed services and the gap between the Medicare benefit and the cost of the service.

**19B Publication of statistical information relating to accredited ART centres etc**

- AHHA supports the requirements for publication listed in this section.

I would be pleased to discuss these views in more detail, if necessary.

Sincerely,

Alison Verhoeven  
Chief Executive  
Australian Healthcare and Hospitals Association