

**Submission to the Independent Hospital Pricing
Authority (IHPA) on the inclusion of Family Planning
Clinics within the scope of Public Hospital Services
eligible for Commonwealth funding under the
National Health Reform Agreement**

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Submission to the Independent Hospital Pricing Authority (IHPA) on the inclusion of Family Planning Clinics within the scope of Public Hospital Services eligible for Commonwealth funding under the National Health Reform Agreement

Background

IHPA released its draft Pricing Framework in January 2012 for public comment and submissions. IHPA has described the Pricing Framework as a key strategic document for the Authority, which will guide its determinations on the pricing of hospital services, as well as on the scope of public hospital services eligible for Commonwealth Government activity-based funding under the National Health Reform Agreement. IHPA is currently considering the comments received on its draft Pricing Framework and is expected to release its final Pricing Framework later this month.

In its draft Pricing Framework, IHPA proposed a number of criteria for deciding whether a public hospital service should be considered within scope and therefore eligible for Commonwealth funding. These criteria included services provided in 2010 through outpatient clinics on the campus of public hospitals. Inclusion of such services in national reporting was proposed to be the means by which their provision in 2010 would be confirmed.

Criteria for inclusion of non-admitted services within the scope of eligible hospital services

In parallel with public consultations on the draft Pricing Framework, IHPA circulated a draft General List of services which it considered to fall within the scope of these criteria. In relation to non-admitted services, the draft General List indicated that, to be included within scope, a non-admitted service event must meet the definition of a service event which is:

“...an interaction between one or more healthcare provider(s) with one non-admitted patient, which must contain therapeutic/clinical content and result in a dated entry in the patient’s record”.

Additionally, IHPA indicated that it would seek to verify that the non-admitted service was reported as a public hospital service in the 2010 Public Hospital Establishments Collection provided by State health departments to the AIHW.

The draft General List of eligible services proposed to exclude Family Planning from the Tier 2 clinic list which IHPA would use to determine eligible non-admitted services for Commonwealth funding purposes.

Family Planning Victoria (FPV) was included in consultations on the draft General List convened in February 2012 by the Victorian Department of Health with health service providers. In the course of these consultations, FPV indicated its concern that IHPA was proposing to exclude Family Planning clinic services from the scope of eligible services, and the implication of this exclusion that Family Planning clinic services did not meet the criteria of an eligible service event, or a hospital service reported to the 2010 Public Hospitals Establishments Collection.

This submission provides IHPA with further information on how Family Planning Clinic services provided by Victorian public hospitals meet the criteria to be included as an in-scope non-admitted service eligible for Commonwealth funding under the NHRA. Women's and Children's Healthcare Australasia confirm that services provided in Victorian public hospitals act as a reliable proxy for similar services in public hospitals across Australia; notwithstanding the variety of service names or the extent of services provided in public hospital outpatient clinics.

Service events provided in Family Planning Clinics of Victorian public hospitals

IHPA's proposed criteria of an eligible service event relates to the patient's interaction with a health care provider, the therapeutic/clinical content of that interaction, and the recording of the interaction as a dated entry in the patient's medical record.

Family Planning Clinic services provided by Victorian hospitals are currently funded through the Victorian Ambulatory Classification & Funding System (VACS). The VACS system was introduced in 1997 as a form of casemix funding for outpatient services. VACS hospitals report patient visits to one of 35 VACS weighted medical/surgical clinic categories. Each year, the Victorian Department of Health adjusts VACS weights for these clinic services according to the costing data provided by VACS hospitals.

Family Planning Clinics are one of the 35 VACS clinic categories in Victoria. In August 2010, services included within the Family Planning Clinic category (401) were:

"...treatment, referral, management, information and advice services for patients with problems relating to family planning. This includes advice on contraception, pap smears, sterilisation, infertility, termination of pregnancy, menopause, and pregnancy in general, the provision of pregnancy testing services and post-natal follow-up and breast screening services. Patients are seen by a gynaecologist, and/or reproductive endocrinologist".¹

An example of these services are those provided by three family planning clinics at the Women's Hospital, Melbourne.

- Choices/Family Planning Outpatient Clinic, which provides:
 - Contraception consultations.
 - Education on pregnancy prevention.
 - Sexual health screening and Pap testing. If abnormal results are discovered (e.g. bacterial infections) treatment is also provided.
 - Procedures for the removal or insertion of contraceptive devices including Intra Uterine Devices (IUDs) and contraceptive implants.
 - Pregnancy choices and termination options.

¹ Victorian Ambulatory Classification and Funding System, *Examples of services provided in specialist and allied health outpatient clinics – approved by the VACS Clinical Panel*, Victorian Department of Health, August 2010

- Well Women's Clinic, which provides
 - Consultations regarding all forms of contraception..
- Menopause Clinic, which provides:
 - Care for women with concerns about menopause, including women with early menopause or menopause caused by surgery or illness.

All of the above services are provided by health care professionals and result in an entry in the patient's medical record.

The reasons women, or their referring practitioners, may choose to use services such as these at the Women's Hospital also include:

- Special needs, such as disability (most GPs will not have a hoist), the need for an interpreter, gender diversity, or homelessness.
- Complex/specialist medical needs (the Women's Hospital does not see routine low risk family planning cases).
- Woman is already a patient at the hospital – attendance with a pregnancy or gynaecological problem may be the only contact a well woman of reproductive age has with health services and it is important that her needs are able to be comprehensively addressed. An outcome to be avoided is the return of such women with an unwanted pregnancy or undiagnosed sexually transmitted infection which may become pelvic inflammatory disease.

Reporting as a public hospital service in 2010 Public Hospital Establishments (PHE) collection

Family Planning Clinic services funded under VACS were reported in the Public Hospital Establishments (PHE) data collection prior to and including 2010, under the group category of Other Medical/Surgical/ Obstetrics services.

Family Planning Services are reported within the VACS system as activity category 401. The 401 activity is rolled up in the Victorian PHE submission under the Other Medical/Surgical/Obstetrics services group as it is not a stand-alone category within the PHE. Consequently, IHPA may not have been aware that Family Planning Clinic services meet the criteria of having been reported to the PHE collection in 2010.

FPV sought an example of how the 401 category data in VACS maps to the Other Medical/Surgical/Obstetrics group in the PHE return to the AIHW. This is illustrated in Table 1 (see Appendix).

FPV also sought data on reported hospital outpatient activity in the Family Planning Clinic category (401) in 2010-11. Table 2 (see Appendix) lists the reported activity at 10 Victorian health services in 2010-11, including the Women's Hospital, which was the largest provider of these clinic services.

Summary

Family Planning Victoria is making this submission to IHPA in order to correct what it sees as a misconception about the nature of family planning clinics provided by Victorian public hospitals, which has led IHPA to propose to exclude these clinics from the scope of services eligible for Commonwealth funding under the NHRA. FPV considers that these are demonstrably public hospital service events, that they have been funded as such by the Victorian government since the introduction of the Victorian Ambulatory Classification and Funding System in 1997, and that they have accordingly been reported with other VACS data to the PHE collection of the AIHW.

Neither Family Planning Victoria nor Women's and Children's Healthcare Australasia are funded by or through the hospital system. We view the potential exclusion of family planning services provided in public hospital outpatient clinics from eligibility for Commonwealth funding as a serious threat to access by women of appropriate health services.

A handwritten signature in black ink that reads "Lynne Jordan". The signature is written in a cursive, flowing style.

Lynne Jordan
CEO
Family Planning Victoria

Appendix

Table 1: VACS Family Planning codes mapping to PHE group categories

FORM	DataElementCode	CommonName	Clinics File	Establishment File
S9	O_GFamPlan	401: Family Planning VACS	Obstetrics	A9.6 Other Med/Surg/Diag
S9	O_GFamPlanOther	401: Family Planning	Obstetrics	A9.6 Other Med/Surg/Diag
S92_111	O_GFamPlanOther	401: Family Planning	Obstetrics	A9.6 Other Med/Surg/Diag
S9	DVAO_GFamPlanOther	401: DVA Family Planning	Obstetrics	A9.6 Other Med/Surg/Diag
S92_111	DVAO_GFamPlanOther	401: DVA Family Planning	Obstetrics	A9.6 Other Med/Surg/Diag

Table 2: Family Planning Clinic encounters reported to VACS, 2010-11

Health Service	2010-11
Austin Health (AU)	931
Bendigo Health Care Group (AU)	210
Eastern Health (AU)	137
Mercy Public Hospitals Inc. (AU)	151
Mildura Base Hospital (AU)	2,595
Northeast Health Wangaratta (AU)	8
Peninsula Health (AU)	213
Southern Health (AU)	875
The Royal Women's Hospital (AU)	9,432
Western Health (AU)	1,114