9 April 2021

Mr James Downie
Chief Executive Officer
Independent Hospital Pricing Authority

By email to: submissions.ihpa@ihpa.gov.au

Dear Mr Downie

Re: Draft IHPA Work Program and Corporate Plan 2021–22

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide feedback into the public consultation on the draft IHPA Work Program and Corporate Plan 2021-22 (the Work Program).

The RANZCP is the principal organisation representing the medical speciality of psychiatry in Australia and New Zealand and is responsible for training, educating and representing psychiatrists on policy issues. The RANZCP represents more than 6700 members, including more than 5000 qualified psychiatrists, and is guided on policy matters by a range of expert committees including the Faculty of Consultative-Liaison Psychiatry.

The RANZCP thanks you for your letter dated, 17 July 2020, responding to our IHPA Work Program submission in 2020, providing updates on key areas of concern: mother baby units, services for older people and consultation-liaison services.

The RANZCP appreciates the work undertaken with IHPA to date including discussions regarding changes to pricing for mother baby units. As per your letter dated, 17 December 2020 regarding the pricing of mother baby units, we look forward to a discussion between the IHPA, RANZCP and Women’s Healthcare Australasia around how pricing may better reflect psychiatry practice and patient needs in mother baby units.

The RANZCP recognises the work undertaken by the IHPA to develop a solution to consultation-liaison psychiatry funding, including discussions around possible alternatives such as a switch to block funding or the development of intervention codes. Any solution should also strive to ensure that mechanisms are in place to ensure funding stays within consultation-liaison budgets. We understand this is challenging, but it is important to ensure adequate funding is received for all instances of consultation-liaison psychiatry services as multiple services are usually required. Stigma against prioritising mental health services in health services remains problematic and appropriate pricing methods will go far in restoring the balance to this issue. As such, the RANZCP appreciates the recognition that consultation-liaison psychiatry should be identified in the Australian Classification Health Interventions.
We would also like to raise the following points for consideration regarding consultation-liaison psychiatry including:

- Reference to the International Classification of Diseases (11th Revision) could be undertaken under the ‘acute care classification’.
- Continue to maintain the Tier 2 Non-Admitted Services Classification while undertaking development work for the Australian Non-Admitted Care Classification.

In addition, it may also be beneficial to have timeframes where work is expected to be completed such as education on non-admitted services for activity-based funding.

The RANZCP also supports the recognition in the draft Work Program of the impacts of the COVID-19 pandemic on hospital pricing within the Work Program.

If you would like to discuss any of the items raised in this letter or would like to schedule a meeting, please contact Rosie Forster, Executive Manager, Practice, Policy and Partnerships via rosie.forster@ranzcp.org or by phone on (03) 9601 4943.

Yours sincerely

Associate Professor John Allan
President

Ref: 2225