

31 March 2026

Committee Secretary
Senate Standing Committees on Community Affairs
By email to: community.affairs.sen@aph.gov.au

Dear Senate Community Affairs Legislation Committee,

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

Thank you for inviting the Royal Australian and New Zealand College of Psychiatrists (RANZCP) to make 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 RANZCP supports health legislation reform, and our feedback aims to enhance the bill's impact on consumers.

The RANZCP is the peak body for training, educating and representing psychiatrists in Australia and New Zealand. The RANZCP has more than 9000 members, including around 6500 fully qualified psychiatrists. The recommendations contained within this submission are based on extensive consultation with the RANZCP's Committee for Ethical and Professional Practice, Section of Private Practice Psychiatry Committee, ADHD Network and RANZCP Fellows. As such, the RANZCP is well positioned to provide assistance and advice about this issue due to the breadth of academic, clinical and service delivery expertise it represents.

The RANZCP supports greater transparency regarding the costs to see a psychiatrist which enable consumers to make more informed decisions about their healthcare. However, access issues faced by consumers is a result of the underlying workforce shortages in the mental health system and will only be addressed by the governments [sustained investment into specialist mental health services](#).

The RANZCP values equity of access and highlights that some of the proposed changes will negatively impact consumers. While the RANZCP is supportive of the intent of the Bill, it should not proceed in its current form without amendments to address the concerns outlined below.

Single Fee Figure

The RANZCP understands the Department intends to use a single fee figure to determine the cost of a service provided by a medical practitioner. While the methodology to determine this figure has yet to be agreed, the RANZCP strongly advises that medical practitioners are consulted before adoption and implementation by the Department.

Regardless of the methodology adopted, our Members have raised concerns that the fee published on Medical Cost Finder website (the website) will not be a true reflection of the realistic costs to a new patient. Psychiatry is a relationship-based profession where each presentation is unique and care is tailored to the needs of the consumer.

As such, there is high variability in complexity of presentations along with duration of assessment and treatment for all psychiatric consultations. This makes the publishing of a single fee figure problematic, as a psychiatrist's fee can vary based on a multitude of factors, including referral pathways.

Therefore, publishing a single fee figure runs a risk of misrepresenting the typical cost of care and will lead to underquoting on the website and misleading the public. It is also not clear if the website will offer any functionality for individual doctors to provide their own fees and/or explanatory notes (if the bill passes). The RANZCP recommends that the Department includes fee ranges rather than a single figure. A range of fees would recognise variability in the complexity of consultations and enable clinicians to provide contextual information.

Lastly, the Department states that the single fee figure will reflect a medical practitioner's provision of a service for a 'given financial year'. This figure would presumably be derived from the previous financial year and risks misinforming the consumer due to fee changes related to inflation, costs of service delivery etc., The website should make this clear for consumers to avoid situations where the current fee is higher than what the consumer expected from the website.

Consumer Choice

The RANZCP strongly supports empowerment of consumers in determining their healthcare. However, the RANZCP highlights the suggested initiative could undermine quality of care for those that need it most. Predominantly, a consumer's choice of medical practitioner should not always be based on price alone, and the website is likely to incentivise decisions driven by cost comparison rather than clinical necessity. Furthermore, cost is not an indicator of quality and that should be explicitly stated on the website.

The Department should consider how information about medical practitioners is presented on the website for consumers. For example, consumers may misinterpret out-of-pocket costs without understanding the contribution of Medicare rebates and private health insurance. The RANZCP recommends the Department provide guidance on other factors that might reasonably be considered when a consumer is making a choice (e.g. services offered, location and wait times), including cost breakdowns and anticipated gap fees.

The website should also highlight that consumers are encouraged to make an informed choice based on as much information as possible and in consultation with their referring GP. In empowering consumers to make more informed decisions about their healthcare, the website should also offer information regarding comparable services offered by the public system within their area.

In summary, educational materials and guidance, in addition to cost and cost-breakdowns, should be provided on the website for consumers to understand the information presented to make the best-informed choices about their healthcare.

Fees inflation due to this initiative

While the RANZCP supports greater fee transparency, the publication of fees risks increasing the fees of lower-charging doctors by increasing their demand to an unsustainable level. This will not put downward pressure on higher cost medical practitioners but instead will *raise the floor* for medical practitioner fees. Furthermore, other unintended consequences of the proposed bill may include medical practitioners inappropriately standardising care and reduced willingness to take on more complex presentations. This will negatively impact equitable access to mental health care for Australians.

The pathway to contest inaccurate billing information

Contesting inaccurate billing information on the website will involve a process of internal review. As such, there should be a definitive commitment to a timely process for internal review. Otherwise, disputed or erroneous data could sit on the website for a considerable period and impact on a doctor's business, creating unrealistic expectations for consumers and is likely to impact timely care. It is recommended that any disputed single fee figure on the website should be highlighted as being under review.

Summary

The RANZCP is grateful for the opportunity to provide comment to the Senate Standing Committee regarding the Health Legislation Amendment (Improving Choice and Transparency for Private Health Consumers) Bill 2026 and supports the importance of fee transparency and improving informed choices for consumers regarding their healthcare.

The RANZCP recognises this initiative is designed to improve cost, transparency and access, however, more work needs to be done to address the availability of health services in Australia. Specifically, the RANZCP calls for the government to increase the Medicare rebates to reflect the current cost of healthcare, and this should be reviewed regularly.

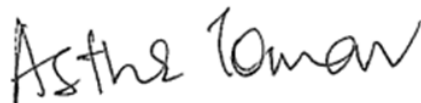
The RANZCP recommends that the Bill be amended to:

- Consult with medical practitioners regarding fee publication.
- Consider the implication of varying fees based on the consumers circumstances.
- Allow for doctors to input explanatory notes on the website.
- Include a clear explanation on the website of what fees mean for consumers and how they are calculated.
- Consider other education materials to be presented on the website to help guide consumer choice.
- Consider the implications of fees adjusting based on this policy and use fee ranges in place of single fee figures.
- Implement clear and timely pathways to contest inaccurate information on the website.

The RANZCP is eager to work with the Department to develop further strategies for fee transparency and affordability that respect both consumers interests and specialist practice.

If you have any questions or require further information, please contact Dr Kenley Kuoch (Manager, Practice & Standards) via policy@ranzcp.org.

Yours sincerely



Dr Astha Tomar
President