

4 September 2017

Review Secretariat  
Department of Human Services  
Email: [mca.review@humanservices.gov.au](mailto:mca.review@humanservices.gov.au)

Dear Secretariat

### **Independent review of health providers' access to Medicare card numbers**

Optometry Australia, the peak professional body for optometrists and optometry in Australia, welcomes the opportunity to input to the independent review of health providers' access to Medicare card numbers.

In 2016, over 5,000 optometrists provided over 8.6 million primary eye and vision care services that were billed to Medicare. The majority of optometrists provide these services through community-based practices, that are either small independent businesses, franchises or part of a larger corporate entity.

We wish to offer brief comment with regard to relevant questions posed through the discussion paper only, as below.

#### *2. What identifying information should patients have to produce to access health services?*

Optometry Australia advises that in some contexts and for some patient populations there are barriers to maintaining a physical Medicare card. This includes, for example, people in transit living arrangements or who may be experiencing homelessness, and separated parents sharing care of children where the child is listed on only one parent's Medicare card. For these patient groups, the expectation of producing a Medicare card may put an unnecessary burden on them and act as a deterrent to accessing health services. We ask that this be considered in determinations of what information patients are required to provide in accessing services supported by Medicare.

#### *4. What would the impact on health professionals be if they were required to move from an individual or site level PKI certificate to a PRODA account? Would any enhancements to PRODA be required for health professionals to accept it as a replacement?*

Optometry Australia notes that PRODA currently only provides for one tier of access when it comes to accessing information; the PRODA account which is registered to the individual provider allows for complete access including eligibility checking, Medicare number checks, banking details and claiming services. A number of our members have noted this as of concern and it may be a potential deterrent for others considering adoption PRODA. Optometry Australia believes there would be benefits to considering at least two tiers of access, one for the primary account holder (health provider) and a second tier for administrative or practice staff. Restricting access to PRODA services and resources in this way may also help increase security of information.

*6. If delegate arrangements in HPOS were to be time limited, what processes or alerts would the Department need to put in place? What would be a reasonable period for delegate arrangements to last before they require review?*

The current delegate arrangements in PRODA does not allow for either restricted access to delegates or a review of the nominated staff members access. Whilst the capacity to access all functions of PRODA may be convenient for practice administration and processing of patient billing, separate login details for different staff and intermittent time outs might provide better tracking of who has accessed the system and when, and hence support increased security of information.

*Question 8. In what circumstances do health professionals require access to Medicare card numbers through the provider enquiries line? Could the provider enquiries line be made available in more limited circumstances?*

There are a number of contexts in which an optometrist will be unable to access a patient's physical Medicare card and won't have access to online services. This is most common in outreach clinics, including in remote Indigenous communities where patients may not present with the Medicare card or have access to their card and internet access may be limited. In these circumstances, it would be most appropriate for the provider line to be made readily accessible and for relevant information to be provided in a timely manner.

Thank you for your consideration.

Yours sincerely



Lyn Brodie  
**CEO, Optometry Australia**