



Australian Salaried Medical Officers'  
Federation (New South Wales)

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Elizabeth Koff  
Secretary for Health  
NSW Ministry of Health  
Locked Mail Bag 961  
North Sydney NSW 2059

Attention: Trevor Craft, Deputy Director, Workplace Relations

Dear Ms Koff,

### **Patient Billing and Revenue Collection (PBRC)**

ASMOF represents Staff Specialists who exercise Rights of Private Practice (ROPP) consistent with the Staff Specialists' Determination.

The implementation of the PBRC has had what may be unintended consequences which significantly disadvantage and potentially place at risk Staff Specialists who exercise their Rights of Private Practice in accordance with the Determination in a number of ways:

- i. The way PBRC is currently operating, although the Public Health Organisation (PHO) is authorised to bill on behalf of Staff Specialists who exercise ROPP, the PHO is not authorised to determine the level of billing (up to the Scheduled Fee) independently of the Specialist providing the service;
- ii. Associated with point (i) is the difficulty using PBRC in allowing Staff Specialists to charge over the scheduled fee when permitted (e.g. DVA, WCC and Overseas visitors without reciprocal arrangements);
- iii. PBRC as it currently operates does not easily or transparently inform the Senior Medical Officer what bills have been or are about to be billed in their names, nor at what rate, which may seriously prejudice the SMO in the event of an audit;
- iv. PBRC does not recognise self-referrals which may be clinically appropriate;
- v. PBRC is unable to bill for in-patients seen in other hospitals; for example, when a POWH Staff Specialist approved to provide inpatient services provides approved services to POW Private Hospital, there is no direct means by which to bill for such services.
- vi. ASMOF understands that PBRC has total autonomy regarding the rate at which it charges, and does not need to consult or even notify SMOs when changing rates;

- vii. PBRC makes no arrangement for charging or following up differences between the scheduled fee and what is charged under PBRC/bulk bill significantly reducing (15%) billings which would be available if the ROPP arrangements directly associated with the Staff Specialists' Determination was to be applied.

Given the significant concerns with PBRC exemplified above, ASMOF members are demanding changes to the billing/PBRC processes and will also be seeking an indemnity from any actions taken against them by the Commonwealth flowing from these shortcomings of the PBRC billing processes. Accordingly, I request that you contact ASMOF Senior Industrial Advisor Bob Morgan to arrange a mutually convenient time for the parties to confer at a senior level regarding this matter.

Yours faithfully,



Dr Tom Karplus  
Secretary



24<sup>th</sup> October 2017

Cc John Roach, Deputy Secretary, Finance