



Private Healthcare Australia

Better Cover. Better Access. Better Care.



**Response to ACCC consultation regarding the Vision Eye Institute Limited
request for re-authorisation AA1000693**

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About Private Healthcare Australia

Private Healthcare Australia (PHA) is the Australian private health insurance industry's peak representative body. We have 21 registered health funds throughout Australia as members and collectively represent 98% of people covered by private health insurance. PHA member funds provide healthcare benefits for over 14.4 million Australians.

Response

PHA has no objection to the Vision Eye Institute Limited's request for re-authorisation following the expiration of A91491. Nor does PHA object to the Vision Eye Institute Limited's application for revocation of authorisation A91491 and substitution of a new authorisation AA1000693.

However, PHA recommends that if the ACCC does grant authorisation to the latter, the ACCC impose a condition on authorisation that all medical practitioners covered by this authorisation use price displays for common services. This will promote choice, competition and informed financial consent.

Price displays should be posted on windows or other prominent areas of the clinic and on websites, so consumers can make informed decisions about whether to book an appointment. Further, the medical practitioners affected by this authorisation should be required to post their fees on the Australia's Government's [Medical Cost Finder website](#) as a condition of authorisation.

Price displays should include clear, accurate fees for the most common services provided by medical specialists at Vision Eye Institute Limited, including initial consultations, subsequent consultations, laser eye surgery and cataract surgery.

Data from the Australian Prudential Regulation Authority shows that after a period of stability, out-of-pocket costs for specialist medical services charged to people with health insurance have surged over the past four years.

This trend could cause Australians to forego necessary medical treatment. Data from the ABS¹ and Patients Australia² show between 10-20% of people referred to a specialist are not attending, because of cost, or uncertainty about the cost.

The variation for out-of-pocket costs for ophthalmic treatments is very significant. For example, around half of people who have a cataract operation pay no out-of-pocket costs, while one in twenty pay more than \$1500. The variation between geographic locations is also very significant. Of those paying out-of-pocket costs for a cataract operation, the median costs in Western Australia are \$150, while in the ACT the median is \$1600.³

¹ ABS, <https://www.abs.gov.au/media-centre/media-releases/more-people-putting-seeing-health-professionals-due-cost>

² Patients Australia, <https://www.patients.org.au/shock-specialist-bills-and-hidden-fees-patients-silently-bear-the-burden/>

³ See <https://medicalcostsfinder.health.gov.au/services/H37/ih>

Ensuring transparency for costs charged by medical specialists will help ensure more Australians are able to shop around and access specialist medical care that suits their needs, including from ophthalmologists co-operating on fees set at Vision Eye Institute Limited locations.