

16 July 2019

Mr James Downie CEO  
Independent Hospital Pricing Authority  
PO Box 483  
Darlinghurst NSW 1300

By email to: [submissions.ihpa@ihpa.gov.au](mailto:submissions.ihpa@ihpa.gov.au)

Dear Mr Downie

**Re: Feedback on the Consultation Paper on the Pricing Framework for Australian Public Hospital Services 2020-21.**

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide feedback into the Independent Hospital Pricing Authority's (IHPA) Consultation Paper on the Pricing Framework for Australian Public Hospital Services 2020-21 (the Pricing Framework).

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 6600 members, including more than 4900 qualified psychiatrists, and is guided on policy matters by a range of expert committees including the Faculty of Consultation Liaison Psychiatry, the Faculty of Psychiatry of Old Age and the Section of Perinatal and Infant Psychiatry.

The RANZCP has concerns around several areas which are absent from the Pricing Framework. In January 2019, the RANZCP responded to the IHPA Pricing Framework for Australian Public Hospital Services 2019-20 with concerns regarding the costings involved in consultation liaison psychiatry, mother baby units and mental health for the elderly. In February 2019, we were pleased to receive a letter in response to our concerns advising of an opportunity to discuss consultation liaison psychiatry and mother baby units in further detail. This communication was shared with the Faculty of Consultation Liaison Psychiatry and the Section of Perinatal and Infant Psychiatry who expressed they would welcome the opportunity to discuss these in more detail.

The RANZCP also has some concerns that mental health care for the elderly is not covered in the Pricing Framework, as this is an area of growing importance with Australia's ageing population. There is currently significant ambiguity and overlap between psychogeriatric care types and mental health care types, particularly sub-acute and non-acute care. The interface between mental health services for the elderly and acute adult and geriatric medical service pathways can lead to the disadvantage of mental health services for the elderly. When applying costs to these areas, these costs can only be identified using models which are better applied to mental health rather than general health which impacts on sustainability and funding for mental health services.

The RANZCP welcomes the opportunity to set up meetings with IHPA and relevant members around pricing approaches for old age mental health care, consultation-liaison psychiatry and mother and baby units.

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, Senior Manager, Practice, Policy and Partnerships via [rosie.forster@ranzcp.org](mailto:rosie.forster@ranzcp.org) or by phone on (03) 9601 4943.

Yours sincerely



Associate Professor John Allan  
**President**

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