

The Independent Hospital Pricing Authority, *Consultation Paper on the Pricing Framework for Australian Public hospital Services 2020-21*

Thank you for the opportunity to provide comment on this significant issue.

**Preamble;** Due to the acute care sectors increasing access and demand issues for acute care beds there has been a shift to transfer some of this burden of care to manage acute care type patients in the Subacute services.

Patients are not uncommonly referred to Subacute beds as their discharge goal or admitted for Rehabilitation, Restoration or Maintenance care types which do not adequately reflect the patients real complexity of care needs and issues.

There is an increased use of Subacute beds for patients with, complex chronic health care issues, complex acute confusional states, patients with significant issues of frailty, patients with mental health issues, end stage neurological conditions and end stage palliative care.

My question on behalf of my members is that does the current consultation paper on the pricing framework include a review of the funding for Subacute and Non-acute care as well as any development in the AN-SNAP version 5 to address some of the funding issues needed to support the complexity of admitted patient care requirements for acute type care patients, patients with complex chronic health care conditions, issues of patient frailty, patients in acute confusional states (Alzheimer's, delirium, dementia) and patients requiring full hospitalized palliative care in Subacute wards.

Kind regards

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