

Preparing a written submission for the Practitioner Review Program – for practitioners

As part of the Practitioner Review Program (PRP) you may be given an opportunity to provide a written submission or additional information relating to concerns about your claiming or prescribing.

What you need to know

A written submission may help the delegate of the Chief Executive Medicare (delegate) to better understand your practice and the reasons for differences in relevant Medicare claims or Pharmaceutical Benefits Scheme (PBS) prescribing data.

The role of a delegate of the Chief Executive Medicare

Health professionals and senior staff employed by the Department of Health and Aged Care (the Department) have been delegated certain powers of the Chief Executive Medicare, including the power to make a request to the Director of Professional Services Review (the Director) to review the provision of services during a specified period.

If a matter under consideration by the PRP is referred to a delegate, the delegate will review all relevant available information to decide whether a request to the Director should be made.

If the delegate considers that a request to the Director is not warranted and all concerns relating to potential inappropriate practice have been addressed, the matter will be closed. If the delegate has remaining concerns about potential inappropriate practice, they may decide to make a request to the Director.

Invitation for a written submission

Before the delegate makes a request to the Director, the delegate may invite you to provide a written submission. If you are invited to provide a written submission, the delegate will advise you of the timeframe to provide your submission.

If a review by the Director is requested, the delegate will provide the Director with information to help complete the review. This may include information provided by you in your submission, as well as other relevant information such as Medicare servicing data, prescribing data and information provided by you in your interview, if one occurred.

A written submission is optional

If you are invited to write a submission, it is not mandatory. It is your choice to provide a written submission.

If a written submission isn't made the delegate will make a decision based on the relevant available information. This information will include the report of the interview, if one has occurred, and the relevant Medicare claims and PBS prescribing data. If there has been a period of review after the interview, the delegate will also consider the Medicare and PBS data for that period. If the delegate has concerns about possible inappropriate practice, following their consideration of the information reviewed, they may decide to request a review of your provision of services by the Director.

A written submission is optional (continued)

Useful information to include in your submission

If you are invited to provide and decide to prepare a written submission it does not have to follow any specific format. You can provide any material that you think may be relevant.

The following may help in writing a submission:

- Consider the outline of the concern(s) that have been provided to you, and address each concern clearly and succinctly.
- Include information about your practice which might be relevant to the concerns. If you are not sure, include the information and explain why you think it is relevant.
- If applicable, consider providing copies of relevant policies, procedures, or training material.
- If we have provided you with data, consider using it to help illustrate your response.
- Where relevant, consider commenting on your particular interests and skills, your patient demographics, or specific characteristics of the locality in which you practice.