

**From:** s 47F  
**To:** [Prostheses Reform](#)  
**Subject:** Submission on terms of reference [SEC=No Protective Marking]  
**Date:** Monday, 11 November 2019 11:03:58 AM  
**Attachments:** [image003.jpg](#)  
[20191108 - Letter to Health Department on Prostheses.pdf](#)

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Dear Health Department,

Good morning.

Please find attached a brief submission on the proposed terms of reference for the Prostheses List Review of the General Miscellaneous Category.

My apologies for the slightly overdue submission, noting submission were due at 9:00am.

Kind regards,

s 47F

11.11.2019

Department of Health  
Prostheses Reform Section  
Office of Health Technology Assessment  
Technology Assessment and Access Division  
Via email: [prosthesesreform@health.gov.au](mailto:prosthesesreform@health.gov.au)

Dear Department of Health

I write regarding circular PHI 68/19 – the proposed ‘Prostheses List Review of the General Miscellaneous Category.’

Medibank welcomes the review, which has potential to identify savings that will directly benefit our customers.

The review is supported by Medibank, but three observations are made on the proposed terms of reference:

- The timeframe for the review is overly long and should be reduced to three months. The proposed six-month timeframe means that any recommended changes arising from the review may not have sufficient time to either receive Ministerial approval ahead of the 2021 private health insurance premium round or be given sufficient time for such changes to be reflected in financial forecasts by private health insurers ahead of their formal premium application submissions for the 2021 premium year.
- The review should consider whether items in the General Miscellaneous Category are being used as indicated or ‘off-label’ (i.e. in settings not specifically identified in the labelled indications).
- The proposed terms of reference should clarify the “targeted stakeholder consultation” process, ideally specifying a timeframe for submissions (within an overall review period of three months, as proposed above) and an opportunity for comments/submissions on the review’s proposed findings/recommendations to the PLAC.

Medibank will contribute to the review, noting that prostheses costs and volumes are a material contributor to private health insurance premium growth.

Thank you for the opportunity to comment on the proposed terms of reference.

Should you have any questions, please contact Medibank’s Head of Government Relations, <sup>s 47F</sup>

Yours sincerely,  
<sup>s 47F</sup>