

SIMONS, Sharon

From: Brendan Adler <badler@envisionmi.com.au>
Sent: Monday, 13 March 2017 13:32
To: s22(1)(a)(ii)
Subject: Meeting Request to discuss specialist MRI licensing [SEC=No Protective Marking]
Attachments: Envision MRI.docx

Hi s22(1)(a)(ii)

Thank you for your letter to Jane who is on leave this week.
I greatly appreciate the opportunity to speak to the Minister given his evidently busy schedule.

I assume the Minister has access to earlier correspondence to the previous Minister Ley.

However, I would like to provide the attached summary which incorporates more recent events.

Kind Regards,
Brendan.

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ENVISION
MEDICAL IMAGING

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Achieving improved patient outcomes in the provision of MRI rebates

Comment [1]:
Please make corrections like this if you need it.

MRI represents one of the most important radiological techniques that does not use potentially cancer-causing ionising radiation. Since MRI rebates were introduced in 1998, the Perth population has risen from 1.3 to 2 million. All eight private practice full licenses in the metropolitan area have been granted to the two large corporate practices creating a longstanding duopoly which has curtailed competition and resulted in poor patient access to expert MRI services in Perth.

Envision is a medium sized, low volume, quality driven radiology practice primarily catering to specialist referral. We are the preferred provider for multiple elite sporting teams due to the quality of our service. Almost all specialist referred prostate and cardiac imaging is currently performed at Envision due to the complexity of this work.

In 2012, all regional centres with compliant MRIs were granted full licences. None were granted in the Perth metropolitan area. Feedback from the Department at the time was that despite an excellent submission, Envision's application was rejected due to us being too close to existing licence holders.

Notwithstanding this, the department has allowed Capite Radiology to swap a full licence from Mildura to Melbourne originally granted for its regional location. Additionally in Perth, a partial license that had not been used since 2012 was allowed to be transferred to another suburb 20 km closer to the CBD.

It is worth noting that Envision has been located as close to our referring specialists as possible. Patients referred to us from specialists will commonly drive to outer metropolitan suburbs to have their scan on an MRI machine which attracts a rebate given closer existing licensed MRIs are full. They will typically be imaged on older 1.5T MRI units rather than our recently acquired high end 3T MRI machine given there is no incentive for existing full licence MRIs to be upgraded in the absence of any real competition.

MSAC is currently considering rebates for prostate and cardiac MR imaging. Were these rebates granted exclusively to full licensed MRI units, there would be little doubt that as with other studies, patients would be forced to be imaged on a rebated scanner. This would be despite these older units not being optimised for these kinds of studies and being performed by technical staff without years of experience. In addition, the studies would be interpreted by radiologists who have not been routinely interpreting these studies.

Envision is of the opinion that:-

1. The granting of a full licence to Envision would likely change where patients have their studies with little or no budgetary impact given these patients are having their scans rebated on other machines elsewhere.
2. By granting us a full license and levelling the playing field with the two big corporate practices, the government would increase the choice available for patients and their doctors. The Commonwealth would benefit because patients would receive a better service for their rebate as their scans would be performed on a newer, better MRI machine and would be reported by more experienced and skilled radiologists.
3. We are confident that Envision would have been granted a full license if licensing was based on the MRI service quality a practice provided and that granting us a license would be helpful to the people of Perth and their care.

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