



# Human Genetics Society of Australasia

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## **RE: Independent Health and Aged Care Pricing Authority (IHACPA) Consultation Paper on the Pricing Framework for Australian Public Hospital Services 2024-25**

The Human Genetics Society of Australasia (HGSA) was formed in 1977 to provide a forum for the various disciplines represented under the title of Human Genetics and is the leading professional body for health professionals working in the fields of genetics and genomics. Our members include clinical geneticists, genetic counsellors, diagnostic scientists, researchers and academics. We appreciate the opportunity to provide a response to the consultation paper.

We welcome the addition of a new Tier 2 Non-Admitted Services Classification, 40.66 Genetic counselling as we proposed in our response to the 2022-23 consultation. It is essential that data for this classification is accurately captured by reporting agencies and includes activity in non-genetic specialist services where genetic counselling is taking place.

In earlier correspondence with IHPA we have raised concerns regarding the complexity of genetic services and the inconsistencies in data capture for costs of genetic and genomic testing. We raised the issue of underfunding due to the underestimated costs and additional administrative burden associated with genetic services, arising from diagnostic complexities and the extensive work required outside of face-to-face consultations.

In the Consultation Paper on the Pricing Framework for Australian Public Hospital Services 2023–24, IHPA confirmed its intention (first outlined in 2021) to give consideration to a new adjustment to the NEP for genetic services. Beyond the already noted addition of the new 40.66 classification, we do not see any mention of genetic services in the 2024-25 consultation. We note the National Efficient Price

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Determination 2023–24 price weight for 20.08 Genetics has fallen from 0.1837 to 0.1686. We recognize the NEP determination is informed by data submitted from the jurisdictions but this fall is at odds with the increasing complexity and costs of genetic and genomic testing.

We urge the IHACPA to urgently follow through with their commitment confirmed in the 2023-24 Consultation Report to work with jurisdictions and key stakeholders to undertake further investigation, noting the need for improved data reporting and capture as prices for genetics services are set using the cost and activity data submitted by the states and territories. HGSA welcomes any opportunity to assist in these investigations.

Yours sincerely,

**Dr Kevin Carpenter, CEO HGSA**