

COTA ACT

FILE No:
DOC:
MARS/PRISM:

The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
DICKSON ACT 2602

Dear Sir/Madam

Re Application for revocation of authorisation A90954 and substitution of new authorisation A91011 lodged by Canberra After Hours Medical Locum Service.

The Council on the Ageing (COTA) ACT welcomes the opportunity to comment on the application for revocation of authorisation A90954 and substitution of new authorisation A91011 lodged by Canberra After Hours Medical Locum Service (CALMS).

COTA ACT is a not for profit ACT independent consumer organisation concerned with advocacy, policy development and analysis, research, project management and information dissemination. Its work is to protect and promote the well being of all older people.

COTA ACT:

- Represents the rights and interests of older people to governments and oppositions.
- Works with government, non-government and industry sectors to ensure that policy and decision-making processes include the rights and interests of older people.
- Develops programs to assist older people connect with services and resources.
- Promotes the positive contribution, wealth of knowledge and experience that people over 50 have to offer the community and workforce.

A major concern of COTA (ACT) is the substantial increases (over 100%) in the proposed fees of CALMS. These increases will have a serious impact on older people who reside in nursing homes and institutions. From the application it can be seen that the gap for standard home visits (including nursing homes and institutions) between 8 – 11 pm will increase from \$31.95 to \$76.35 for regular patients and from \$21.95 to \$53.35 for concession card holders.

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COTA acknowledges that apparently the revised fee structure generally reflects changes made by the Australian Government to MBS and CALMS' decision to maintain payments received by doctors. However, it is an unfair increase for those on the receiving end of this primary health care service.

A large proportion of residents in nursing homes are concession cardholders. For many of these people an increase in the gap fee in excess of 100% is not affordable. The options for those people if the increase in fees is approved, will be either to: wait until the next working day, which may impact severely on their quality of life; or be transported, via ambulance to the Emergency Department of the nearest hospital, where they will be triaged as non-urgent and have to possibly wait many hours to be seen, again impacting on their quality of life.

Another concern is that people who reside in nursing homes are advised to only keep small amounts of cash on their person, often a maximum of \$50 is recommended. Other monies can be kept locked in the office safe, which in most institutions are closed during the period that CALMS would be utilised. As CALMS often requests payment upon visit, people who require medical care in nursing homes will be unable to access their money to pay for the service.

The new Authorisation will have a detrimental effect on people residing in nursing homes. COTA ACT requests that the ACCC rejects this application and asks CALMS to review their fee structure to promote a fair and accessible system to all ACT residents.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Paul Flint', written in a cursive style.

Paul Flint
Executive Director
COTA ACT
25 October 2006