



Dr Richard Chadwick  
General Manager Adjudication Branch  
Australian Competition and Consumer Commission  
GPO BOX 3131  
CANBERRA ACT 2601

Dear Dr Chadwick

**CALMS application for revocation of authorization A91092 and substitution of new authorization A91276 – interested party consultation**

Thank you for your letter of 28 September 2011 regarding consultation on the CALMS application for revocation of authorisation A91092 and substitution of new authorisation A91276. I appreciate the opportunity to comment on this application.

ACT Government Health Directorate is supportive of the application for new authorisation A91276 lodged by CALMS Ltd.

In the preceding letter of 4 October 2011, ACT Government Health Directorate indicated support for CALMS' application for interim authorisation. In this letter I will provide further information regarding reasons the 'not to exceed' fee cap schedule is necessary for the continuing provision of CALMS' services.

CALMS operates an accredited primary afterhours medical service available to all ACT residents based on clinical need, inclusive of Residential Aged Care Facilities (RACFs) through the entire after hours period, from 6pm to 8:30am Monday to Friday, Saturdays and Sundays, and ACT public holidays inclusive of the period 25 December to 1 January.

This afterhours medical deputising service (through appointment or residential attendance), in the hours when other GP services are not available, is an important part of primary care services in the ACT. In the 2010-11 financial year CALMS' GPs undertook 18,829 consultations, with over 1000 residential visits.

CALMS provides GP locum services for cases when a patient requires attention but the medical problem is not an emergency or life-threatening and therefore a visit to the Emergency Department is not required. CALMS' services complement the nurse-led Walk-in Centre that is located at the Canberra Hospital, which provides attention for minor injuries and illnesses and is open extended hours.

CALMS also complements the Commonwealth funded Healthdirect and GP Helpline services, which provide medical advice over the phone. If medical professional assistance is necessary in the afterhours period, the caller maybe referred to the most appropriate local face-to-face services, such as CALMS, the Walk-in Centre or the Emergency Department.

The fee schedule applied by CALMS is available to clients prior to booking an appointment. The adoption of a "not to exceed" fees policy by CALMS provides consumers with certainty when making a decision about accessing the service. A "not to exceed" fee structure also provides CALMS locums with flexibility to bulk-bill when required. In 2010-11, over 96% of visits to RACFs and 22% of home-visits were bulk-billed.

In the highly diversified health market, price plays a major role in consumers' decisions regarding health care treatment. A 'fee cap' as requested by CALMS in its application, is a sound measure to eliminate price uncertainty and allow consumers to make health care decisions based on health need.

Thank you again for allowing ACT Government Health Directorate to comment on the above application by CALMS. I look forward to notification of the outcome.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Peggy Brown', written over a circular stamp or mark.

**Dr Peggy Brown**  
**Director-General**

14 October 2011

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