

21 May 2020

Ellie Dwyer
Merger and Authorisation Review
Australian Competition & Consumer Commission
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Via Email: adjudication@accc.gov.au

Dear Ms Dwyer,

**RE: Private Healthcare Australia Limited's application for authorisation
– AA1000487 – interested party consultation**

The Australian Psychological Society (APS) welcomes the opportunity to provide feedback regarding the application for authorisation from Private Healthcare Australia Limited (PHA). We understand that the Australian Competition and Consumer Commission (the ACCC) is particularly interested in:

- the likely public benefits and detriments of the Applicants' cooperation;
- the appropriateness of authorising the Proposed Conduct for a period of six months from the ACCC's final determination; and
- whether any conditions should be placed on the authorisation of the Applicants' cooperation.

We understand that the applicants sought authorisation to make and give effect to arrangements, and to discuss and share information with each other in relation to:

- broadening private health insurance coverage to include COVID-19 treatments and modes of treatments that substitute for face-to-face interaction or admission to hospital;
- providing financial relief regarding insurance premiums; and
- other measures as notified to the ACCC in response to the COVID-19 pandemic.

In summary, the APS congratulates the applicants' proactive response on behalf of its members and the Australian public who have shared many concerns about the implications of COVID-19 for private health care. From the APS perspective, the interim authorisation quickly alleviated much anxiety both amongst psychologists and the public regarding coverage of psychological services under private health care policies through recent times.

We know from data from Medicare data that over 50% of psychological consultations are now being conducted via telehealth (phone or video) which is a significant increase from the rate prior to the emergence of COVID-19.

It has been a relief for psychologists to know that they will continue to be able to support their existing clients, as well as new clients, who may rely on their private health care provider to fund these sessions. Likewise, we imagine that it has been vital for clients to know that they are entitled to access online psychological services under their existing policies, as well as knowing that their premiums would not increase during this time of widespread financial insecurity.

However, in line with our previous advocacy, access to private health care subsidies should not be conditional upon clients using their Medicare entitlements in the first instance.

We understand that the authorisation is a temporary measure to deal with the significant impact that COVID-19 has had on the Australian healthcare system.

Evidence from other pandemics tells us that the mental health repercussions as a result of COVID-19 will be widespread and long-lasting. Therefore, the APS, supports any measures that allow the public to access affordable and timely psychological services, and that acknowledge the extensive health and financial challenges facing the community at this time. Authorising the Proposed Conduct for a period of six months from the ACCC's final determination therefore seems to be appropriate.

Thank you again for the opportunity to provide feedback.

Yours sincerely,



Frances Mirabelli
Chief Executive Officer