

Mr Darrell Channing  
Director  
Competition Exemptions  
Australian Competition and Consumer Commission  
23 Marcus Clarke Street  
Canberra ACT 2601  
Via email: [exemptions@accc.gov.au](mailto:exemptions@accc.gov.au)

Dear Mr Channing,

Further to our letter of 14 October 2021, and in response to your request, we wish to make the following additional points in regard to the application by the WA Primary Health Alliance (WAPHA).

As previously noted, the majority of Australian general practices utilise a data extraction tool. There are several tools available and in use by practices. The option to choose between tools is likely to have fostered innovation in the healthcare information technology sector, which has seen advancements over the years. This ultimately benefits patient care. The impact of WAPHA's application on innovation in the sector, additional costs for extraction tools not preferred or provided by PHNs, and less options for general practices should be carefully considered.

As well as enabling participation in government initiatives, general practices use extraction tools for their own internal quality improvement (QI) activities. For example, general practices will use these tools to identify patients that are at risk of developing health conditions or that would benefit from a particular intervention; as well as participating in health research. It is not possible to quantify the scale and impact of these QI and research activities but removing access to extraction tools general practices are familiar with may restrict their ability to undertake such activities. In other words, a practice may be familiar with operating extraction tool A but will no longer be able to afford to use this tool when the local PHN stops offering it for free because they prefer and provide tool B. It may also take time and resources for general practices and any QI or research partners to change systems and become familiar with operating a different tool.

Lastly, there are benefits from standardisation of extraction methods across products. At present, the way data is extracted and captured varies between tools. This may impact on the accuracy of comparisons and analysis between data sets extracted from different tools. Greater standardisation across tools would enable more improved accuracy, which would likely contribute to better health planning and health outcomes, whilst the option to choose a preferred product would remain for general practices.

Thank you again for the opportunity to comment and if you would like to discuss please contact Stephan Groombridge, National Manager eHealth & Quality Care at [REDACTED].

Yours sincerely



**Karen Price**

President