



Human Genetics Society of Australasia

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The liability of members is limited

IHPA Secretariat
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9 October 2020

RE: Independent Hospital Pricing Authority (IHPA) Consultation Paper on the Pricing Framework for Australian Public Hospital Services 2021-22

Dear IHPA Executive,

We are writing on behalf of genetic counsellor members of the Human Genetics Society of Australasia (HGSA) and the Australasian Society of Genetic Counsellors (ASGC), a special interest group of the HGSA. Thank you for the opportunity to respond to this consultation paper.

Genetic counsellors are allied health professionals with specific training in human genetics, counselling and health communication. Genetic counselling is a communication process to help people and their families understand, adapt to, and proactively manage genetic health risks. Definitions of genetic counselling are available from the [HGSA website](#) and [AHPA website](#).

The genetic counselling workforce makes a significant contribution in the provision of clinical genetics services. Clinical genetics activity (genetic counselling) by genetic counsellors has been formally recognised as an independent profession by the HGSA since 1989, and an increasing amount of clinical genetics activity is provided independently by genetic counsellors. The HGSA is a member of the [National Alliance of Self Regulating Health Professions](#) (NASRHP) for the regulation of genetic counsellors, and maintains a public register of appropriately qualified, trained and regulated genetic counsellors on the HGSA website (www.hgsa.org.au).

Genetics is classified as a 20 series - Medical consultation:

20.08 Genetics

Category: Medical consultation

Usual provider: Clinical geneticist

Definition of service: The provision of services to persons requiring advice and treatment of hereditary and/or genetic disorders.

Inclusions: counselling provided as part of the genetics program

It is not transparent how or whether the IHPA costing for Genetics applies to activity by genetic counsellors as health care providers, and it is applied inconsistently across jurisdictions. There is no category for services delivered by genetic counsellors as allied health providers in the 40 series - Allied health and/or clinical nurse specialist intervention. Anecdotally, the General Medicine code 40.53 has been applied in some jurisdictions.

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The ancillary costs of providing genetic services, including significant preparation time and case complexity, test costs (that are often borne by the genetic service budget) and operational costs including essential administrative staff (who do not directly generate ABF qualified service events) are not well accounted for in the combined pricing for geneticists and genetic counsellors. Genetic counsellors also participate in other clinical activities that are an essential part of Clinical Genetics Services, but that have historically not been included as ABF qualified service events. In particular, genetic counsellors often represent the genetic service at clinical case review and multi-disciplinary team meetings, or are contacted for consultation to provide advice to other health professionals. This is also a barrier to innovative models of care, such as embedding genetic counsellors in other specialist clinics to provide support to non-genetics healthcare providers.

- While we understand that there will be significant delays to the development and implementation of the new Australian Non-Admitted Care Classification (ANACC), it will be very relevant to genetic counsellors. As such, we ask that the HGSA and the ASGC be included as stakeholders for consultation.
- We also ask that the HGSA and the ASGC be included in the consideration of the addition of limited clinical nurse specialist/allied health led clinics to the current Tier 2 Non-Admitted Services Classification. As genetic counsellors increasingly provide independent allied health services, either within a genetic clinic or other specialist service, a similar model might apply for a genetic counselling clinic led by a genetic counsellor.
- In the meantime, clarity from IHPA about the application of the pricing framework to the services provided by genetic counsellors would promote consistency across jurisdictions.

We look forward to hearing from you.

Kind regards,

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