

Tuesday, 12 April 2022

MSAC Secretariat Australian Government Department of Health MDP 960, GPO Box 9848 Canberra ACT 2601

Provided by email only <u>dimsac@health.gov.au</u>

RE: Feedback sought on proposed diagnostic imaging services

Dear Secretariat,

Thank you for the opportunity to provide feedback on the Medical Services Advisory Committee (MSAC) recommendations, seeking feedback on a range of diagnostic imaging services, both new and amended items.

These recommendations have been considered by the Australasian Sonographer Association (ASA) Sonographer Policy & Advisory Committee and Board, composed of highly experienced sonographers.

The feedback provided is specific to the sonography related points of 6, 7 and 8 in the document provided.

Point 6 – New items for multiple pregnancy 12–16-week ultrasound

The consensus is this new item for multiple pregnancy is positive. However, the proposed payment is undervalued and does not reflect the amount of time spent on these multiple pregnancy patients. This undervalue could force reputable scanning clinics to pass on gap fees to patients.

Point 7 – New items for nuchal translucency for multiple pregnancy

The consensus is this new item for multiple pregnancy is positive. However, the proposed payment is undervalued and does not reflect the amount of time spent on these multiple pregnancy patients. This undervalue could force reputable scanning clinics to pass on gap fees to their patients. Or resort to booking multiple examinations on different days to access the billing codes.

Point 8 – New items for cervical length assessment for high-risk or at-risk pregnancies

The consensus for this new item number is that it is needed. However, a number of issues are raised by the ASA.

- 1) The MBS code should be allowed to be billed in conjunction with other codes in this subgroup. If this code is implemented as it stands, expectant mothers would be required to make multiple scan appointments for billing purposes.
- 2) The clinical indications for this new code are too narrow, they should include all indications that place a woman at risk of preterm birth.
- 3) The fee is inadequate for the time spent on the scan and the skillset needed for an accurate scan.

If you have any questions or require additional information supporting this feedback, please contact the ASA Policy and Advocacy Advisor, Tim Sweeney, by phone on 0448 348 544 or via email at policy@songraphers.org.



We look forward to hearing about the progress of the application and are supportive of the Australian Government implementing the proposed recommendations we have suggested in relation to sonography.

Yours Sincerely,

Ian Schroen President of the Board The Australasian Sonographers Association