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Subject: ASCIA response to IHPA public consultation paper re the Australian Non-Admitted Care Classification (ANACC) [SEC=No Protective Marking]
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Attachments: [IHPA_australian_non-admitted_care_classification- stakeholder_consultation_paper.docx](#)

To whom it may concern

Thank you for the opportunity to comment on the attached Independent Hospital Pricing Authority (IHPA) public consultation paper on the development of the Australian Non-Admitted Care Classification (ANACC). As we received late notification of this consultation we greatly appreciate the 2 week extension for our response.

The consultation is relevant for clinical immunology and allergy services, particularly for immunoglobulin replacement therapy for immunodeficiency, allergen challenges and allergen immunotherapy.

Whilst administration of blood and blood products (which should include immunoglobulin replacement therapy) is included in the following table on page 39, food and drug allergen challenges are not included.

ASCIA requests the IHPA to consider adding these procedures, as most food and drug allergen challenges are currently performed in hospitals. Information about food allergen challenges is available on the ASCIA website www.allergy.org.au/patients/food-allergy/food-allergy-challenges-faqs

In addition, ASCIA requests the IHPA to consider specifying the following under "administration of blood and blood products": "including Intravenous Immunoglobulin (IVIg) or Subcutaneous Immunoglobulin (SCIg)". Whilst IVIg is mostly administered in hospital day clinics, SCIg is mostly self-administered in the home, but requires significant training and education by hospital staff. We therefore believe that SCIg home based programs should be covered by activity based funding (ABF). Information on SCIg and IVIg is available on the ASCIA website www.allergy.org.au/health-professionals/papers/scig

MDC 16 Diseases and Disorders of the Blood and Blood Forming Organs and Immunological Disorders	
Proposed presenting problem / diagnosis-type groupings	Proposed intervention-type groupings
Red blood cell disorders - anaemia	<ul style="list-style-type: none"> • Administration of <ul style="list-style-type: none"> • blood and blood products • interferon
White blood cell disorders	
Immunodeficiency	
Coagulation disorders - thrombocytopenia	
Autoimmune disorders	
Hypersensitivity and allergic disorders	
Neoplasm of blood and blood forming organs	
Other haematological disorders	
Other immunological disorders	

Furthermore, in the following table supplied by an ASCIA member (clinical immunology/specialist) the 20.41 code for Clinical Immunologist shows that there has been a decrease of \$46 per patient, whilst the 40.48 code for an Immunology CNS has increased by \$50. With the exponential increase in allergic diseases over recent years the total amount is still the same, but the denominator (number of patients seen) has dramatically increased. As a result, the more patients that are seen, the less funding is received per patient.

With the increase in patients with allergic diseases, and an increase in more complex and chronic allergic conditions, we believe that the set amount of funding, as well as the funding per patient, need to be increased. An example of a complex patient is one who is allergic to multiple foods, with more than one allergic disease. It is not uncommon that a clinical immunology/specialist will manage atopic dermatitis, food allergy, asthma and allergic rhinitis in the same patient.

As there is currently no PBS funding for allergen immunotherapy (except for venom allergen immunotherapy), public patients receiving this treatment will usually be covered by the hospital, who can only charge a dispensing fee. We therefore also request that the IHPA considers funding for allergen immunotherapy. Information about allergen immunotherapy is available on the ASCIA website www.allergy.org.au/patients/allergy-treatment/immunotherapy

Tier 2	Description	16/17 Price Weights	16/17 Fund/ Case	17/18 Price Weights	17/18 Fund/ Case	VAR Fund/ Case
20.41	Immunology	0.0648	\$360	0.0560	\$314	-\$46
20.44	Infectious diseases	0.0478	\$266	0.0426	\$239	-\$27
40.48	Haematology and immunology	0.0421	\$234	0.0505	\$284	\$50

We welcome further discussions with the IHPA about these issues.

Could you please acknowledge receipt of this email.

Kind regards
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