

Submissions
Independent Hospital Pricing Authority
Level 6, 1 Oxford Street
Sydney NSW 2000

08 October 2020

Dear Sir or Madam,

Re Consultation Paper, 2021-22

Thank you for writing a comprehensive and informative paper.

As a leading clinical coding and grouping software developer, we appreciate the opportunity to provide comment. Of particular interest to EIS is "Chapter 6 Classifications used to describe and price public hospital services", specifically, "6.1 Admitted acute care".

Consultation Questions and Comments

1. **IHPA Q.** What improvements to the content and format of the electronic code lists could be made to enhance their utility?

EIS C. It would be helpful to receive electronic code lists (ECL) segregated by Edition instead of receiving both the current and all past Editions in one file requiring processing by our development team to retrieve the pertinent data.

2. **IHPA Q.** Is there support to replace the hard copies of the AR-DRG Definitions Manual and ICD-10-AM/ACHI/ACS with electronic versions?

EIS C. Optimising productivity through fast, accurate and cost-effective searching, coding and grouping is essential, particularly in a constrained clinical coder employment environment. As a software applications developer, EIS is naturally biased towards electronic versions of the manuals and has invested millions of dollars developing its innovative, high-technology productivity solutions to deliver such solutions for over twenty years.

A competitive, commercial market producing electronic versions of ICD-10-AM with various levels of cost-effectiveness advantages versus printed manuals already exists, ranging from basic eBooks to advanced value-adding productivity solutions based on innovative technology platforms. EIS believes strongly that if IHPA, a publicly funded Commonwealth agency, were to introduce another electronic version into this market it would affect the market and private developers' interest and ability to continue investing in innovation. Our position is that private industry is best placed to focus resources on continuous development and maintenance of digital reference and coding solutions to address the very real need for enhanced quality, efficiency and productivity in this important area of healthcare.

Thank you for the opportunity to provide our comments. We look forward to seeing the collective feedback and continuing to contribute constructively to IHPA's primary function to enable activity-based funding and ensure that pricing, quality and performance are complementary and facilitate a strong national framework for the delivery of public hospital services.

Kind regards,



Anders Ekstrom
CEO