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From: [REDACTED]
Sent: Thursday, 31 August 2023 12:42 PM
To: [REDACTED]
Cc: [REDACTED]
Subject: Consultation re consequential amendments to private health insurance (PHI) reporting standards - HCF

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Good afternoon

Thank you for the opportunity to provide **feedback on APRA's proposed amendments to three Private Health Insurance (PHI) reporting standards (HRS601, HRS603 & HRS 605)**, following amendments to PHI legislation. Specifically, we note that:

- On 1 December 2022, three bills were introduced into Parliament to amend four PHI Acts, the bills being:
 - PHI Legislation Amendment (Medical Device and Human Tissue Product List and Cost Recovery) Bill 2022
 - PHI (Prostheses Application and Listing Fees) Amendment (Cost Recovery) Bill 2022; and
 - PHI (National Joint Replacement Register Levy) Amendment (Consequential Amendments) Bill 2022.
- These bills were passed in March 2023 and will come into effect on 1 July 2023.

HCF's feedback on the proposed consequential amendments required to HRS601, HRS603 & HRS605 (in order to align with the PHI legislation amendments) is summarised as follows:

- We are supportive of replacing references to the terms 'prosthesis, prostheses and prosthetic' with 'medical device/s or human tissue product/s'. However, we suggest an abbreviation be included in the Data Dictionary / Definitions sections of the impacted reporting standards that may be used for ease of convenience, for example MD/HTP.
- Given the amendments are merely replacing redundant terms with new and updated terms, but does not affect the scope of previously referred 'prosthesis', now 'medical device/s or human tissue product/s', we are also supportive of the amended reporting standards applying to reporting periods ending on, or after, 31 December 2023.
- Updated methods of submission, and allowing for a transitional reporting period under the old reporting standard for reporting periods ending before 31 December 2023, are also duly noted and agreed with.

We thank APRA for the opportunity to provide feedback and are happy to answer any questions pertaining to our submission.

Kind Regards

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