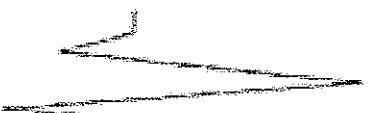


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SOUTH AFRICAN PRIVATE PRACTITIONERS FORUM

SUBMISSION ON NATIONAL HEALTH AMENDMENT BILL

16 March 2012



WHO IS SAPPF?

- Independent Voluntary Association of Private Specialists
- Representing Clinical Disciplines
- Membership in excess of 2500
- Established 2008 as a non-profit organisation
- Governed by a Board of Directors:
 - Nominated by members
 - Accountable to members
 - CEO appointed by the Board

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INTRODUCTION

- In accordance with the Constitution's entrenchment of health care as a fundamental human right and our ethical obligations as members of the medical profession, the SAPPF is committed to progressively act to improve access to health care for all South African citizens.
- Specialists play a vital role in any health care system, and accordingly, it is imperative that the role of specialists be considered in the context of establishing an entity to perform independent oversight on health care.



AIMS

**Aim of the National Health
Amendment Bill is to establish
the OHSC by amending the
National Health Act of 2003**

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CONCERNS

The concerns of SAPPF:

- Independence
 - Of the Entity itself
 - Reporting lines
 - Determining norms and standards
 - Ombud
- Norms and Standards
- Funding
- Accreditation of Specialists

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INDEPENDENCE

- Establishment of entity itself
 - Preferably by separate statute
 - *"In the future, an independent National Inspectorate will carry out inspections ..."*
- Reporting Lines
 - The OHSC should report directly to Parliament
- Determining Norms and Standards
 - The Minister is not obliged to consult nor is bound by any recommendations of the OHSC
 - As a provider of services itself the DoH and the minister should have no influence on setting the norms and standards
- Ombud
 - The Ombud should be independent from the OHSC with its own separate office
 - Should be able to dispose of complaints without dependence on the CEO or Minister

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NORMS AND STANDARDS

- Avoid conflict with standards set in current legislation, ethical rules, guidelines and protocols on clinical care and treatment.
- These standards have to be set by professionals working in their specific fields.
- Peer review should be by peers and internationally controlled bodies are independent of government organisations.
- It is of critical importance that the profession be consulted in the establishing of clinical norms and standards.
- The SAPPF is ideally positioned to participate in this process.

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FUNDING

- It is our understanding that 50% of the funding will be provided by “fees for services rendered”
- “Fees and Services rendered” are not defined
- Impossible to comment on the impact this will have on health establishments and private practitioners
- Greater clarification must be provided with respect to funding

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ACCREDITATION OF SPECIALISTS

- In the briefing session to this Honourable Committee the Deputy Minister stated that “a regulatory framework with accreditation of institutions was necessary to ultimately ensure mandatory compliance and to protect the public”.
- SAPPF does not support the accreditation of individual doctors by another entity.
- Doctors hold professional qualifications and are registered with a statutory body (the HPSCA) – and have to comply with stringent professional requirements.
- Duplication of this function would in our view be an imprudent and inappropriate use of resources.

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ADDITIONAL COMMENT – PRIVATE SECTOR PRICING

- The medical scheme rate has declined in real terms to 1/3 of what it was 40 years ago.
- The SA private sector is more cost effective than the majority of international public health sectors.
- The formula developed by the CMS for the NHRPL process reveals current scheme benefits to be about 1/3 of what calculations suggest they should be.
- Worldwide Medical CPI is 3% higher than national inflation rates
- Specialists fees in the CMS annual registrar reports include cost of equipment, material and staff salaries.
- Malpractice costs increased by 650% over 15 years vs procedure fees by 88%.

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CONCLUSION

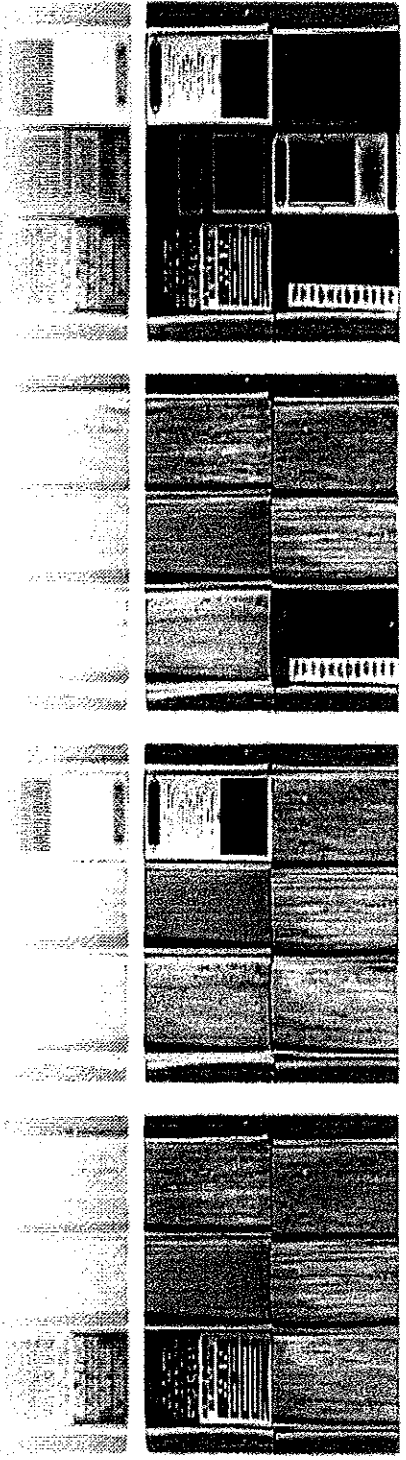
- The office of OHSC must be independent in the true sense of the word
- Accreditation procedures must not be duplicated
- Profession needs to be consulted with respect to the setting of clinical norms and standards
- We welcome the opportunity to participate in this process
- The SAPPF remains committed to promoting access to quality health care for all South Africans

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Q&A



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