

Secretariat: PO Box 463 Canberra ACT 2600

Our advocacy team is based in Canberra

Email: ceo@cosboa.org.au
www.cosboa.org.au

Productivity Commission 4 National Circuit Barton ACT 2600

By email: 5pillars@pc.gov.au

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Dear Productivity Commission

Delivering quality care more efficiently

Introduction

The Council of Small Business Organisations Australia (**COSBOA**) welcomes the opportunity to respond to the Interim Report on Delivering quality care more efficiently (**Report**). Small businesses are major providers of care related services, from general healthcare and allied health to early learning and community care. They play a central role in supporting the wellbeing of Australians across the community.

Small business providers face an overwhelming administrative burden along with regulatory inconsistencies with state and federal rules contradicting each other in some circumstances. Time and capital spent on duplicative compliance is time lost from the provision of care itself and from business growth. Reforms to align quality and safety standards across care sectors, streamline worker registration, and digitise provider processes are long overdue.

COSBOA's commentary on themes raised by the Report is outlined below.

Greater Alignment

COSBOA agrees that the Government should pursue greater alignment in the quality and safety regulation of the care economy and the protection of the public.

Red tape can be reduced by allowing Professional Associations to accredit practitioners for all government programs. Private Health Funds have a comprehensive and effective accreditation system in partnership with Professional Associations. A similar framework should be the basis for all government health programs, including NDIS and Homecare. It is important that Government avoid duplication and use existing and trusted partners. There must also be clarity on the appropriate qualifications required for the level of service being provided.

It is also important to invest in and finalise My Health Record, Provider Connect Australia (PCA) and the Sparked Project. The digitisation of an individual's health records in one portal would make it easier for practitioners and individuals to access the health care they need. Costs would also be reduced as the need for duplicative tests decreases and provides a direct avenue for patient centred care.



Prevention

It is important that prevention is incentivised in healthcare. There has been a volume of research on the value of therapies such as nutrition, manual therapies and movement for preventative healthcare, with Private Health Funds recently approving a number of numerous additional modalities for rebate such as Yoga, Pilates and other natural therapies. Whilst rebate amounts are limited, increasing individual rebates per service would improve access.

Preventative healthcare programs should also focus on addressing risks for substantial at-risk populations, such as those living with hypertension, diabetes, cancer. COSBOA points to a case study in our initial submission on Pillar 4.

Research

Research is the foundation of evidence-based healthcare. Significant investment in preventative healthcare is required to ensure sustainable funding and integration of therapies across both the healthcare and preventative health sectors.

Conclusion

Reforms that reduce compliance duplication, streamline processes, and genuinely accommodate the operational needs of small business and interoperability of healthcare records will deliver not just greater efficiency, but better, more localised care.

COSBOA is ready to work with government and the Productivity Commission to ensure practical, proportionate, and effective reform is achieved with small business in mind.

We look forward to our continued partnership and advocating for practical solutions to uplift Australia's small businesses.

Yours sincerely,

Matthew Addison

Chair, COSBOA

