

From: harry@saoa.co.za <harry@saoa.co.za>

Sent: Thursday, January 10, 2019 7:20 AM

To: Shakila Singh <shakila@bonitas.org.za>

Subject: FW: SAOA BOARD STATEMENT ON PPN 2019 MANUAL

ATTENTION: KENNETH MARION

Dear Sir,

We wish to draw your attention to the recently introduced PPN Manual , which, from our perspective , incorporates principles which are ethically undesirable.

Optometrists are highly skilled practitioners who are registered with and regulated by the Health Profession Council of South Africa. The professional services they provide translate into healthy vision, a 'gift' often taken for granted. The comprehensive examination performed by the optometrist involves a battery of procedures which require specialised skill and expertise, the results of which may lead to the early detection of pathology, the necessity for spectacles, etc.

The autonomy and professional discretion of optometrists, in our view, are to be regarded as sacrosanct and to be respected. In this regard, we wish to highlight aspects of the PPN manual which are cause for concern and which have resulted in a wave of outrage and discontent from practitioners themselves.

At the outset, it needs to be stated that the SAOA Board is astutely familiar with the principles of managed health care, which refer to the use of financial, risk assessment and healthcare delivery mechanisms, together with rules based and clinical management based programmes, to facilitate the appropriate and cost effective delivery of healthcare services in such a manner as to optimise these services whilst using limited financial resources. Furthermore, the SAOA Board opposes fraudulent conduct in any shape or form and is supportive of reasonable mechanisms to combat such conduct where it occurs;

The SAOA Board is nevertheless strongly opposed to certain aspects of the PPN manual as presented.

Authenticate IT as presented

In essence, PPN includes Authenticate IT and finger printing as part of what is termed "Total 2019 Comprehensive Eye examination". This is highly irregular and inaccurate. The eye examination represents a professional service rendered and is unrelated to an on-line ordering system or the use of a biometric system. PPN has given a value to the examination which is lower than that of the value used 2018, which is their prerogative.

Authenticate IT is linked to PPN accredited suppliers. Thus Optometrists who participate in Authenticate IT are restricted in their choice of lenses as are available from those suppliers. Whilst PPN claims that all suppliers are able to apply for accreditation, there are various reasons why all suppliers may not be accredited, which include an unwillingness to comply.

Authenticate IT induces Optometrists to participate on the basis of a financial incentive which involves the preferential purchasing of lenses from identified or accredited suppliers. The professional fee for an examination, where Authenticate IT is not utilised, is thus used as a disincentive (penalty) for non-participation.

Balance Billing

PPN has outlawed balance billing referring to the HPCSA Ethical Rules and the Medical Schemes Act to support this position. However, there is no reference to balance billing in either the Medical Schemes Act or HPCSA's Ethical Rules.

In practical terms, the prohibition of both split billing and balance billing means that practitioners are not able to charge a fee above the medical scheme benefit at any time, even on the basis of clinical necessity or patient choice. In a practical case, the prohibition of balance billing would imply a patient is NOT allowed to choose a frame in value in excess of his or her benefits nor would a patient be allowed to have lens extras that are beyond the prescribed benefits. This infringes firstly on patient choice and care and secondly takes away the autonomy of the Optometrist to prescribe a product that best addresses the needs of a patient, even if a patient consents to that treatment and is willing to pay for it pursuant to the patient's rights in terms of the National Health Act, 2003.

The SAOA Board is of the view that this confiscates the autonomy of the Optometrist and undermines professional discretion where deemed appropriate.

It is to be noted that the SAOA had requested PPN to put the implementation of the manual on hold until issues raised could be resolved amicably. The SAOA was informed that the request was impossible to accommodate as PPN was already contractually bound to participating medical schemes.

It is also to be noted that whilst there may be legal considerations, the issues raised above are considered by the Board to be matters of principle. Nevertheless, the SAOA Board will continue to engage with all relevant stakeholders in pursuit of an appropriate solution in addition to obtaining the necessary legal advice in respect of the application of the HPCSA's Ethical Rules, the provisions of the Medical Schemes Act and competition law.

We trust that the above will receive your urgent attention. Should you have any queries or require additional information, you are welcome to contact me on 084 482 4517 at any time.

Please would you acknowledge receipt of this mail.

Thanking You,

Kind Regards

Harry Rosen
Consultant Chief Executive Officer



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