



Season Greetings

Dear SAOA Member

SAOA BOARD STATEMENT ON PPN 2019 MANUAL

We refer to our recent communique disseminated relating to the introduction of the PPN manual for 2019 and subsequent response from PPN. We comment as follows:

1. It is unfortunate that PPN chose not to address the relevant issues raised but preferred to divert attention and refer to unrelated issues. It is further regrettable that PPN chose to personalise its response with a factually inaccurate allegation. It is to be noted that any office bearer, consultant or otherwise appointed representative is mandated by the SAOA Board to act on its behalf. Any personal affront is therefore inappropriate and unfounded.

2. 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;

3. 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;

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

5. Authenticate IT as presented:

5.1 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.

5.2 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.

5.3 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.

6. Balance Billing

6.1 PPN has outlawed balance billing referring to the HPCSA Ethical Rules and the Medical Schemes Act to support this position.

6.2 However, there is no reference to balance billing in either the Medical Schemes Act or HPCSA's Ethical Rules.

6.3 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.

6.4 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.

Warm regards
SAOA Board

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