



# ANZCA

FPM

2 June 2026

Ms Brigid Dohnt  
Assistant Secretary, Benefits Integrity Division  
Department of Health, Disability and Ageing

Sent via email: [brigid.dohnt@health.gov.au](mailto:brigid.dohnt@health.gov.au)

CEO

Australian and New Zealand  
College of Anaesthetists

Dear Brigid,

### Legislative Reform – Medicare Integrity

The Australian and New Zealand College of Anaesthetists (ANZCA) appreciates the opportunity to review and provide feedback on the high-level legislative reform amendments to support Medicare and health programs.

ANZCA is supportive of strengthening Medicare integrity and recognise the importance of maintaining public confidence in the health system. Our priority is ensuring that reforms are proportionate, clinically informed, and workable in practice, particularly for specialties such as anaesthesia and pain medicine, where service delivery and billing are inherently complex and variable.

Based on the high-level information provided, we don't see any significant issues with the flagged legislative reform. Our relevant feedback covers the following:

We recognise that these are standard audit and integrity measures that reinforce the standards and protocols that are mostly in place. Associated clear guidance and safeguards that support these processes are essential.

Stakeholder agreement on the scope and definition of "alleged breaches of strict liability offences and civil penalties" is critical considering the consequential impact.

- The requirement for provider education being completed prior to a provider number being provided is sensible.
- Important to ensure reforms do not inadvertently increase regulatory burden and impost on our fellows for "improving the consistency of health record keeping requirements" and what this would look like in practice, including not imposing duplicative obligations.
- We are comforted to see there is a focus on early, educative resolution pathways, rather than default escalation to punitive action.
- Specialty-specific expertise and clinical peer review is beneficial on how clinical context is assessed, particularly for complex anaesthetic and pain medicine services.
- For completeness, access to clear appeal and review mechanisms should be embedded in legislative reform considerations.

The college would welcome further engagement as required through this process to support implementation of reforms that are both effective and workable in practice. Please contact [ceo@anzca.edu.au](mailto:ceo@anzca.edu.au) with any further information.

Yours sincerely

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Chief Executive Officer

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