

Submission by St Patrick's Mental Health Services on the Public Consultation on Lifetime Community Rating in private health insurance - March 2017

St Patrick's Mental Health Services (SPMHS) is Ireland's largest, independent, not-for-profit mental health service provider. It is committed to the provision of the highest quality mental health care, the promotion of mental health, advocacy and the protection of the rights and integrity of those experiencing mental health difficulties. Through multi-disciplinary teams of highly-qualified mental health professionals, St. Patrick's Mental Health Service provides in-patient and day care services to over 3,000 people each year and over 12,000 out-patient appointment based interventions. St Patrick's Mental Health Services revenue is primarily derived from insurer subscriptions to health insurers who have a contract agreement in place with the organisation.

The prevalence of mental health problems in Ireland is well documented, with one in seven adults experiencing a mental health difficulty in the past year. As an independent mental health service provider SPMHS welcomes the opportunity to provide a submission to the Health Insurance Authority on the review of the Lifetime Community Rating and is making this submission as part of its commitment to uphold and advocate for the rights of service users who experience mental health difficulties. SPMHS has structured its comments to correspond with the queries raised in the Submission Guidelines document.

Insurers' documentation of LCR loadings / Information Provision to Prospective Lives

St Patrick's Mental Health Services view is that all persons taking out health insurance should be fully informed if they are paying an additional loading at the time of sign up. A clear plain English information booklet which is accessible should be issued to all prospective participants and all health insurers should provide this information either verbally or in writing at the time of sign up. An awareness

campaign of the role and function of the Health Insurance Authority may also help in this regard.

Participants in schemes, particularly employer based schemes need to have a clear understanding of the true costs of covering all employees. One mechanism to achieve this for employers could be an information video or some form of online campaign to explain the LCR.

As indicated in the submission guidelines over 10,000 individuals are paying LCR loadings as of 1st July 2016 and further note that some may not be claiming credit for previous eligible periods of cover. St Patrick's Mental Health Services is of the view that all documentation issued to new insured lives should explain how an LCR loading could be lowered if insurers have been provided with details of previous eligible cover. A standardised and mandatory, explanatory section for previous eligible cover should be included on any application with a clear unambiguous explanation for applicants. In this way new lives have a better understanding of their cover, rights and entitlements. Any information aimed at members of the public should be accessible and literacy friendly.

People moving overseas post 1 May 2015 and then returning to Ireland.

St Patrick's Mental Health Services understands that many individuals may need to travel abroad in the short to medium term for work purposes. Although not defined in the legislation SPMHS suggests that the definitions as applied in the Tax Consolidation Acts 1997 and updated annually would be an appropriate definition. Additionally, for any individual moving abroad or returning from abroad would have a familiarity with these terms, thus avoiding confusion. Any definition should align with currently accepted or commonly used norms.

Defence Forces

St Patrick's Mental Health Services acknowledges the importance of suitable and appropriate medical cover for all Defence forces personnel and their families. Members of the Defence forces serve their country and may become injured in so

doing. SPMHS believes that the right to the highest possible standard of health is a fundamental human right and believes that this issue should not be addressed through an LCR loading exemption. A more fundamental human rights approach on how retired members of the Defence forces access high quality healthcare needs to be addressed in line with defence forces of other countries such as the UK and USA where lifetime provisions are made for service men and women both active and retired.

Australian Model for LCR Loadings

St Patrick's Mental Health Services has reviewed the current Australian model of applying loadings for ten years and is in agreement that loadings should be time limited and not applicable for a lifetime. This would ensure that more people have the option to acquire private health insurance without being prohibitively penalised by virtue of their age when commencing a policy. As the Australian model has proved successful SPMHS would suggest following this general guideline for application of LCR ratings.

Other Issues

St Patrick's Mental Health Services believes that service providers are a key stakeholder in matters relating to health insurance and would welcome the opportunity to engage with, and contribute to the discussion and development of the health insurance market with both government and statutory agencies. Of primary concern is the impact of changes to those who engage with our services and their rights and needs are of fundamental importance to the organisation. We are available to discuss any aspects of this submission in more detail.

Submission Ends