

competition in the economy
 vigorous competition drives productivity growth, innovation and value for all
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Submission to the Department of Health and Children on Legislation to establish the Health Information and Quality Authority

S/06/003

May 2006



Mr. David Smith,
Legislation Unit,
Department of Health and Children,
Hawkins House,
Dublin 2.

26th May 2006

Re: Consultation on Legislation to establish the Health Information and Quality Authority

Dear Mr. Smith,

The Competition Authority welcomes the establishment of the HIQA and the roles it is intended to play in the provision of information to consumers, as well as in relation to quality standards and value for money.

Information

Consumers need access to information to enable them to make informed decisions. As health services are naturally complex, this makes the provision of basic information to consumers all the more important.

Many consumers are unaware that information is available or how to access it, or do not have the resources to seek it out. In some instances, sources of useful information do exist, however the value of this information is limited by the absence of standard, reliable and integrated solutions for accessing and utilising these sources.

Consumers are currently faced with many barriers in finding relevant and reliable information in a straightforward manner. Obtaining even basic information, such as where, how and at what price they can access services, can be time consuming and inconvenient. This is largely due to the fragmented way in which health information is held and made available by the

numerous agencies involved, and the under-use or availability of electronic systems. Furthermore, information and advice are generally available only during office hours. Without this information, consumers can find it difficult to make informed choices about proposed treatments and payment options, and in judging the quality of service provided.

One of the proposed functions of the HIQA will be to evaluate the information currently available to consumers on services provided by the HSE or on its behalf; identify deficiencies in this information; and advise the HSE and the Minister on the development of such information to improve the health and welfare of the population. It is also proposed that the HIQA will be responsible for setting standards for the management of information and data relating to health and personal social services in terms of improving the quality, comparability and usefulness of the information for all stakeholders. By making information more accessible, user friendly and easy to understand by members of the general public, the Competition Authority views the establishment of the HIQA and its role in the provision of information as a welcome step both in terms of empowering consumers to make better informed health related decisions and addressing the barriers which consumers currently face in obtaining information.

Functions of the HIQA

Head 9 proposes to vest in the HIQA a wide range of functions in relation to, *inter alia*, the quality and effectiveness of healthcare services. However, in common with the other functions listed for it, there is little indication throughout the rest of the Heads as to how the HIQA will go about fulfilling these functions. That is, to a certain extent, quite understandable in a Bill of this nature, where it is necessary to focus to a considerable extent on structure and process. And undoubtedly the new Authority will be expected to address these matters fully in its Corporate Plan and Business Plan. Nonetheless, if it is to fulfil its functions in relation to quality, standards and value for money with full public confidence, additional transparency would be an advantage. The Tánaiste should, therefore, consider including a requirement that the Authority consult publicly in advance of adopting its Plans – if necessary by publishing a draft for public comment.

Advising on the cost effectiveness of drugs

Head 9(1)(g) provides that the Authority will "*evaluate and provide advice to the Minister and the Executive as appropriate on the clinical and cost effectiveness of health technologies including drugs*". If this function is carried out effectively, it could prove to be one of the most valuable initiatives in the entire Bill. In particular, it would make an enormous difference to the cost-effectiveness of the State Drug Schemes, and bring quantifiable financial benefits to consumers. To be fully effective, however, it needs to be made clear that this function fully involves the assessment of the efficacy of similar medicines, i.e. medicines with equivalent therapeutic effect; inevitably, this means confronting the issue of generic prescribing **and** supply. Head 9(1)(g) should be expanded to make clear that this is what is intended.

Conclusion

In conclusion, the Competition Authority supports the establishment of the HIQA and the important role it will play in the provision of information to consumers of healthcare services, as well as contributing to the quality and cost-effectiveness of healthcare in Ireland. Improving the accessibility of information will empower consumers and enable them to make better informed decisions regarding their health and the services and treatments they choose to consume. The Competition Authority looks forward to the publication of the Information Bill which will address in greater detail the information role of the HIQA.

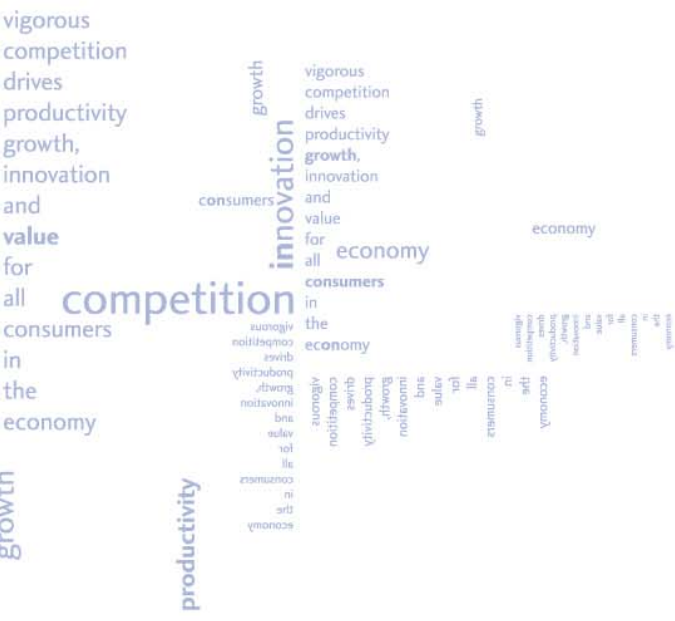
The Competition Authority will be ready and willing to assist the Tánaiste, her Department and the new Authority, in advising of the potential for a proactive competition policy to contribute to the intentions and purpose of the Bill, as well as in the roll-out of the new arrangements.

Yours sincerely,

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