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# Health Market Inquiry

Promoting Healthy Competition

## REGISTRATION FORM FOR WRITTEN SUBMISSION

# HI 1

This is a registration form issued pursuant to the Guidelines for Participation in the Market Inquiry into the Private Healthcare Sector. The form is to be completed by parties making written submissions.

### HEALTH INQUIRY CONTACT:

Physical Address: Competition Commission, DTI Campus, Mulayo Block C, 77 Meintjies Street, Sunnyside, Pretoria, 0002

Postal Address: The Competition Commission, Private Bag X23, Lynnwood Ridge, Pretoria, 0040

Fax: 012 394 0166

Email: [health@compcom.co.za](mailto:health@compcom.co.za)

### Details of person making submission (PLEASE PRINT)

Name and Surname: Mrs Debbie Regensberg  
Name of Organisation or Entity: The Society of Private Nurse Practitioners of South Africa  
Contact Details: spnpnational@gmail.com Tel 0215322623 Fax 0215323759  
Physical/Postal Address: P O Box 321, Rondebosch 7701

### Required Details

Do you wish your identity to be protected from third parties? If yes, attach motivation

Yes  No

Does your submission adversely affect any other firm or individual? Please provide details of such firm or individual:

Does your submission contain any confidential information? If yes, please also file Form CC7

Yes  No

**Main focus of the submission:**

**Facilities / Practitioners / Patients / Consumables / Other** .....  
(Circle relevant one or specify)

**Summary of the issues:**

Private Nurse Practitioners have the ability to extend access to affordable health care as well as reduce the cost of both in- and out-of-hospital care. A number of factors prevent Nurse practitioners from providing appropriate care which are affordable and safe include the regulatory framework, as well as restrictions placed by funders and private hospital groups.

The current mechanisms which give patients access to specialist nursing care are constrained by the controls which the funder organisations put in place through the limitation of access codes for claims; instructing hospital groups to limit access to patients unless the hospital will fund the service; placing constraints on funding of medical equipment so that suppliers must contract nurses to provide services, increasing the risk of perverse incentivization; and removing patient choice in terms of therapeutic access to practitioners.

The current hiatus in the setting of professional tariffs, while it provides an opportunity to review the process whereby such tariffs are set, and the legality thereof, undermines the affordability. This is further exacerbated by the lack of recognition of nursing in the development of Prescribed Minimum Benefits and their associated treatment algorithms. The regulatory framework currently prevents Nurse practitioners from providing services for which they are approved or competent in the public sector to be offered in the private sector. While this may change with the recent enactment of certain sections of the National Health Act, 2003, current discussions with various authorities indicate that these limitations are likely to remain in place. The exclusion of Health Professional groups which do not fall within the ambit of the Health Professions Council has a number of negative effects for patients as well as Nurse practitioners, Social Workers and other members of the multidisciplinary team, resulting in disjointed patient care which may delay access to key services, and also affect the cost of available services.



Signature \_\_\_\_\_

Date 30 June 2014 \_\_\_\_\_

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