



SUBMISSION TO COMPETITION COMMISSION BY SASMO

1. Why this submission is being made: right to reply

SASMO has not made a voluntary submission to the Commission before the 31 October 2014 deadline, as the society and its members were not implicated into any competition law concerns or did not face any potential impact based on the documents that have been available to that date.

It has now, unfortunately, faced a single submission by a stakeholder that makes, in its view, serious allegations that merit SASMO to exercise its right to reply in relation to that submission.

It must be noted that no other medical scheme, and in particular not the large administrators, have made any similar allegations, not have they made any remarks at all in relation to oncologists, their fees / tariffs or any matter related to oncology professional services. This heightens the impression that the allegations contained in the BHF submission is not a widely held view.

2. Who SASMO is

The South African Society of Medical Oncology (SASMO) is a not-for-profit, professional society governed by a Constitution. It represents healthcare professionals who are qualified and registered as medical oncologists and paediatric oncologists. It focuses on professional matters, and do not part-take in any managed care, practice or business matters on behalf of its members.

The allegations by the BHF however seriously undermines the integrity of the profession of medical oncology, a profession which deals with patients facing life-and-death situations, and in which absolute professionalism, and adherence to professional ethics, are of the utmost importance.

The main objectives of SASMO are, amongst others, to:

represent and further the interests of Medical Oncologists in the healthcare sector and to participate in and/or liaise with and/or make submissions to all relevant forums, which shall include, but are not limited to, representation at health sector industry bodies, government departments, legislative bodies and health sector stakeholder collaborations.

promote medical oncology and the interest of oncology patients in South Africa, through, amongst others, supporting and/or working with patient groups and/or cancer study groups

hold at least one scientific meeting every two years, in the form of a congress/conference.

further all aspects of cancer research in South Africa.

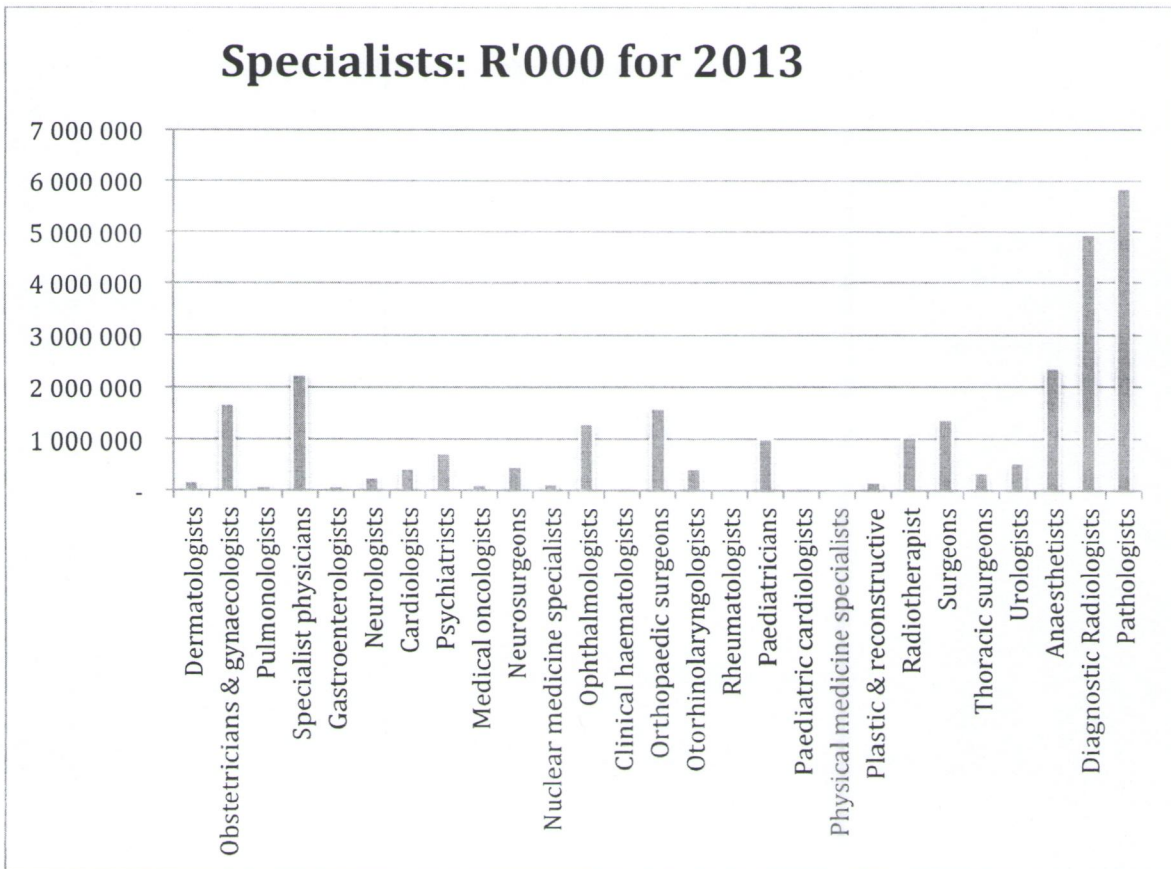
provide a forum for discussion and the exchange and diffusion of information and ideas relating to neoplastic disease.

Scientific and professional discourse, and its application to patient care, is therefore prominent features of SASMO.

3. Oncology tariffs as a portion of overall expenditure by medical schemes on specialists

The 2014 CMS Annual Report, in its Annexures, splits out the monies paid by all medical schemes to various specialists groups, as a total Rand value. Not by the wildest stretch of the imagination can oncologists be seen, from this graph as a cost driver. Neither can honing in on a limited number of codes charged, as part of this amount, merit an assertion that oncology is a cost driver, or that codes are being exploited on a scale that leads to anti-competitive outcomes.

The BHF allegation (par 7.8) that “the field of oncology is highly emotive and constitutes a significant burden to the health system both in terms of disease and cost” is therefore patently untrue insofar as oncologists and their fees are concerned.



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