

Draft National Medical Card Unit Strategic Plan 2016-2018

Submission by the Citizens Information Board (April 2016)

The Citizens Information Board (CIB) welcomes the opportunity to make a submission on the NMCU Strategic Plan. We note that there has been extensive consultation on the matter to date as referenced in the Appendix. This submission draws on the experiences of the countrywide network of Citizens Information Services (CISs) and the national Citizens Information Phone Service (CIPS) in dealing with medical card eligibility queries from the public. These services which are supported by CIB handled over 53,000 such queries in 2015.

The five strategic priorities outlined in the Strategic Plan -- *health and wellbeing, access to health services, transparency and accountability, quality of service, and user experience*— provide a necessary overarching framework. The outcomes expected from the NMCU stated strategic priorities are laudable, reflect what can be inferred as a user perspective and should be regarded as the core of strategic development. These state that people engaging with the NMCU can have confidence that:

- Once they submit an application for Medical Card or GP Visit Card, the application will be processed in a timely manner;
- The eligibility assessment will be undertaken strictly in accordance with the relevant legislation and the national assessment guidelines;
- The assessment outcome will be communicated to the applicant in a clear and unambiguous manner;
- The applicant will be informed of the pathway for a reassessment and the right of appeal, as appropriate.

The enhancement of the allocation and application processes set out in the Strategic Plan is important and necessary and should result in a more accessible system.

Administrative Issues Requiring Attention

The stated underlying Strategic principle of listening to the views and opinions of people engaging with the NMCU and using these to plan and deliver a service of the highest quality is an important consideration. In this context, we note the experience of CIB service delivery partners. This shows that a number of people (a relatively small proportion of Medical Card

and GP Visit Card applicants) find the process of applying for a card and dealing with a review of eligibility difficult and stressful. The administrative difficulties which have been referenced in feedback to the CIB from service delivery partners typically relate to:

- 'Lost' documentation and related repeated requests for information already submitted
- Issues relating to reviews and renewals
- Delays in processing applications and appeals
- Documentary errors
- Errors in assessment of means
- Some misunderstanding in the application of EU regulations
- An inability to contact the official dealing with the application
- Uncertainty (and related anxiety) on the part of individuals as to whether they will be eligible for a Medical Card or retain it following a review.

Strategy Implementation: Matters that need to be addressed

A general administrative issue noted was that a slight change in circumstances results in person having to completely reapply for Medical Card. This can cause distress and possible financial hardship while waiting for card.

While principles of equity and social inclusion clearly underpin the NMCU Strategic Plan and while reference is made to involving representatives of the public having an input on major issues, particularly "ethical and social issues", these aspirations will only become fully meaningful when the following matters are addressed:

- Expediting the development and enhancement of user-friendly aspects of the application process, viz.:
 - Online applications, scanning of documents and improving flow and tracking need to be expedited
 - Ongoing provision for those who cannot engage with on-line systems – there continues to be a significant digital divide in Ireland
 - Mechanisms to ensure that applicants who can show proof of posting of forms and related documents to the NMCU are not required to re-send them
 - Easier access for an applicant or someone acting on his/her behalf to the official dealing with an application

- Correspondence to applicants from the NMCU requesting additional information more tailored to individual applicant circumstances;
- The proposal to introduce a single, integrated process for people to apply for a Medical Card, a GP Visit Card, the Long-Term Illness Scheme, and the Drugs Payment Scheme should be implemented;
- There needs to be rationalisation in relation to application forms -- there are currently five separate application forms – the Medical Card and GP Visit Card, GP Visit Card for the under-6's, the over-70's Medical Card, the over-70's GP Visit Card and the Medical Card Application Form for children under 18 years (i.e. , those with a cancer diagnosis)
- Access points in health offices across the country should be widely advertised in locations frequented by the public;
- Contact facilities similar to those currently available to Oireachtas members should be considered for intermediaries such as CISs and CIPS to enable them to provide appropriate and timely advice and assistance to people who are experiencing difficulties with the application process;
- There should be clearer information on EU medical card eligibility on the part of officials dealing with applications under this provision;
- There should be clearer information on the two types of Medical Card applications and related assessment criteria for people aged over-70;
- There should be total clarity as to what people are covered for under both Medical Cards and GP Visit Cards -- this applies in particular to services provided by GPs;
- There should be some reference to how the ongoing work and deliberations of the Clinical Advisory Group in developing assessment tools for discretionary medical cards will feed into the NMCU Strategic Plan;
- It is important that, as far as possible, the assessment criteria are such to enable decisions on applications made in the first instance to be thorough, transparent and easily understandable in order to minimise the need for appeals which by their very nature can be stressful for people;
- The application system must have a proactive dimension to ensure that people who for reasons of disability or other may have difficulty in engaging with the process do not lose out on a service to which they have a clear legal entitlement;

- Other services where assessments of medical conditions are made could be used as a basis for an award of a Medical Card in order to ensure that people receive joined up services and do not have to undergo unnecessary further assessment (see below).

Broader Policy Issues

In terms of social inclusion and equity, the following matters are relevant and should be included in setting out the context for the NMCU strategic development.

- The thresholds for qualification for a Medical card need to be reviewed -- there has been no increase in these thresholds since 2006;
- The provision for the retention of Medical Cards on taking up employment should be reviewed to take account of situations where a 'Qualifying Adult' is the person taking up employment
- The situation of self-employed people, particularly those with very limited trading, in terms of establishing eligibility for a Medical Card needs to be reviewed;
- Medical Card income limits for young people aged between 16-25 years need to be reviewed;
- The current system of means testing in relation to savings and assets needs to be reviewed in line with the means assessment used by the Department of Social Protection;
- The availability of therapies for Medical Card holders in nursing homes needs to be reviewed to ensure equal access with those living in the community;

Overall Structure and Focus of Strategic Plan

In response to the consultation questions listed, we are of the view the language used is relatively clear and easy to understand and is relatively easy to follow. However, we believe that the high level focus of the document means that it is not entirely clear how the various components will be reflected in practice. While the Mission, Values and Goals are easy to understand and largely reflect the service user needs as identified by CIB service delivery partners, it is not clear how broader health policy and related budgetary matters will impact on the NMCU strategic goals. While key aspects of the medical card application process have been covered, the needs of people engaging with the NMCU, as reflected in queries to CISs and CIPS and as outlined in this submission, may not be fully captured.