



Workers Compensation and Injury Management Bill 2021 (Consultation Draft)

Submission Template

Bill Clause	Comments
Division 4, clause 75	<p>This clause relates to <i>'Eligibility to provide compensable medical and health services [WCIMA s. 5(1) approved treatment, s. 292(2), Sch. 1 cl. 17(1)]'</i>. It is noted under this clause that regulations may prescribe provider eligibility requirements that must be satisfied for a payable medical or health service. The clauses states that provider eligibility requirements may be prescribed by reference to a person's qualifications <u>or</u> experience <u>or otherwise</u>.</p> <p>The Institute of Clinical Psychologists is concerned with the following statement within that clause: "Provider eligibility requirements may be prescribed by reference to a person's qualifications <u>or</u> experience or otherwise".</p> <p>The Institute of Clinical Psychologists is of the view that compensable medical and health services should be restricted to practitioners with appropriate qualifications and experience.</p> <p>It is important to emphasize that experience does not substitute for formal accredited training, most particularly postgraduate training in a university setting that is completed by psychologists with an endorsement in the areas of clinical psychology or counselling psychology. Registered psychologists do not have a practice endorsement.</p> <p>As currently articulated, the statement opens the possibility for unregulated health practitioners and practitioners with insufficient or inappropriate qualifications providing health services (namely psychological treatment) to individuals under the Workers' Compensation system, on the basis of their experience alone, or for some other reason relating neither to appropriate qualifications or experience.</p> <p>The Institute of Clinical Psychologists holds that eligibility to provide compensable medical and health services should be restricted to practitioners with appropriate qualifications and experience. That is, eligibility should be restricted to clinical and counselling psychologists as they are credentialed by the Psychology Board of Australia as having specialist skills and capabilities in the assessment and treatment of various psychological presentations and mental health conditions. Our recommendation is with a view to maintaining the fidelity and safe delivery of psychological services within the Workers' Compensation system to individuals with mental health disorders.</p>

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The Institute of Clinical Psychologists recognises the importance of maintaining high quality mental health assessment and psychological treatment for workers who, by virtue of their injury, are eligible to access support under the Workers' Compensation system. Clinical psychologists are well placed to provide optimum care for this group by virtue of their training in diagnostic assessment and specialist mental health treatment. The *minimum* requirement to qualify as a Clinical Psychologist under current regulations is an accredited 4-year undergraduate psychology degree, followed by a 2-year master's degree in a program focused on mental health, then 2 years FTE of supervised practice. Their training, and that of Counselling Psychologists, exceeds the recognized qualifications of registered psychologists in the area of mental health. As such, Clinical and Counselling Psychologists have demonstrated ability to deliver psychological treatment and assessments.

Clinical Psychologists are well-equipped to assess and treat complex mental health issues including posttraumatic stress disorder, anxiety, depression, and somatic symptom disorders (including persistent pain presentations). They are well-equipped to operate within multidisciplinary treatment team environments, participate in return to work planning, and identify barriers to a return to work (including intrapersonal, interpersonal, environmental and systems).

To safeguard client welfare, and the provision of specialist capabilities in the assessment and treatment of individuals with mental health conditions in the Workers' Compensation scheme, **we recommend a rewording of the statement as follows:**

“Provider eligibility requirements may be prescribed by reference to a person’s qualifications and experience”.

In addition, the Institute of Clinical Psychologists notes and supports the following statements that are made in Information Sheet Number 15 (Medical and Health Experts Compensation)

Q. What health services will be prescribed in regulations? A. In the first instance, the intention is to prescribe in regulations the health services and providers currently referred to as ‘approved treatment’ in the current Act. These are physiotherapy, chiropractic, counselling and clinical psychology, occupational therapy, osteopathy, speech pathology, acupuncture, exercise programs. Regulations provide flexibility to recognise new compensable health services, or to modify the description or criteria that applies to existing health services, if there is a sound basis for doing so in the future.

Clinical Psychologists and Counselling Psychologists are appropriately qualified and experienced to provide psychological assessment and treatment to injured workers, by virtue of their credentialing by the Psychology Board of Australia as having an extended scope of practice and additional approved qualifications, with demonstrated specialist skills and capabilities necessary to assess and treat various psychological presentations.