From: To: Cc:

Subject ation Consultation Paper 25 – Fees Order for Allied Health Services

Date: Monday, 4 December 2023 5:49:03 PM

[External] - Please be cautious when opening any links or attachments if the sender is not known

## To WHOM IT CONCERNS

I am writing in response to the proposed changes in the Occupational Therapy Schedule of fee's as outlined in the Consultation paper 25.

The fee change is significant and highly impactful on therapy services. It is damaging for our profession and will result in less people being able to receive this essential therapy.

All other Health Professionals have been awarded an increase in initial consult fee with the exception of exercise based services which has no change.

Occupational Therapy rates on the other hand have reduced from an Initial Consult at 60 minutes \$219.25 or 45 min \$164.25

I am at a loss as to how the Insurance Commission has made the decision to reduce the OT fee schedule.

The sector that I work in is complex pain management and mental health. All appointments are 60 minutes. The service delivered is in line with clinical psychology. Registration under Medicare's Better Access to Mental Health Initiative requires a therapist to have additional training and undertake certain obligations to uphold the professional requirements to deliver Focused Psychological Therapy. This is in line with Clinical Psychology and I find it quite extraordinary that the Insurance Commission is not mindful of this. There are 2 categories for Psychology, although they both receive the same fee, it does recognise a difference in clinical skills. It would be beneficial to similarly have 2 types of occupational therapy service delivery, and at least the Mental Health OT service to have a schedule of fees in line with psychology or even exercise rehabilitation.

A consideration has been made for potential loss of income for exercise based rehab. The proposed reduction in fees for WA to align with the Eastern states was rejected as it was considered that a change in fee (less \$40) would be too impactful on therapists. And yet there seems to be no issue in removing the OT hourly appt rate (loss of income \$70/hour). This is an extremely significant oversight.

Occupational Therapy is a key therapy for addressing the complex needs of patients with persistent pain. The accessibility to our services needs to be supported to achieve better outcomes for these people and ultimately reduce government costs. It would be useful for you to liaise with OT Australia in regard to this change in fee structure proposal

Thank you for considering my proposal and requests. Kind regards Sasha

## **Director Next Wave Therapy**



## Sasha Wray

Principal Occupational Therapist B. Sc Occupational Therapy | Dip. App Sc Naturopathy





