



Australian Rehabilitation Providers Association
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9 January 2024

Mr Kevin Gillingham
Manager – Policy & Legislative Services, Workcover WA
2 Bedbrook Place
Shenton Park, WA 6008

Dear Mr Gillingham

ARPA WA response to Consultation Papers Nos. 20-27 for the *Workers Compensation and Injury Management Act 2023 (WA)*

On behalf of the Australian Rehabilitation Providers Association (ARPA) WA, thank you for the opportunity to respond to Workcover WA's additional Consultation papers¹. ARPA WA is the industry representative body of accredited Workplace Rehabilitation Providers (WRP).

The ARPA WA Executive committee has met and agreed to the responses to each of the papers:

Implementation Consultation Paper 24: Fees Order for Medical Services:

- Page 5: Fees for specific workers compensation and injury management services: *Workplace Rehabilitation Provider* interaction should be added to the list of specific services as this is a specific service regularly undertaken by treating Medical Practitioners that is currently not on the AMA Fees list. This specific service ensures treating Medical Practitioners engage with WRPs to develop appropriate RTWPs.
- Page 9, item 5: definition of *employer* expanded to include: instructed representatives (ie: a Rehabilitation Provider). As per the point above, treating Medical Practitioners engage with WRPs rather than employers to discuss Return to Work, when WRPs are engaged.

Implementation Consultation Paper 25: Fees Order for Allied Health Services:

- Page 4, Proposed allied health services and fees. Point 5: suggestion to reword, by removing 4 examples and replacing with: "*only services not requested or instructed by authorised insurer*". ARPA believes the current examples/range of controls may not be specific enough to ensure elimination of over-servicing or unnecessary activity by some service providers. Eg, attendance at every Case Conference by other providers.
- Page 7, Travel, ARPA notes the following:

¹ Reference to website: <https://www.workcover.wa.gov.au/resources/modernising-was-workers-compensation-laws/> accessed 9 January 2024

- ARPA believes that not covering return travel may deter consultations holding on-site appointments, impacting proactive outcomes for the injured worker.
 - It is a requirement of the applicable industrial award for Rehabilitation consultants (*Health Professionals and Support Services Award 2020*) that all work-related travel to be (s23.3 (h)) paid an allowance (this is currently set at \$0.96 per km).
 - The WA WRP Principles and Standards (Priority 2: Case Management, 2.4 Travel) does not preclude return travel.
 - If the intention of Workcover WA is to reduce double billing for travel to the same location, ARPA suggests travel is charged from the point of origin with return charges to next point of billing?
- Page 8, Case Conferences: ARPA seeks further clarity with regards to when all parties (including authorised insurers) agree to extended case conferences (particularly for complex matters) to be charged in excess of 30minutes.

Implementation Consultation Paper 26: Fees Order for Workplace Rehabilitation Services:

- Page 4, Travel: Please refer to points raised above for Paper 25 (Travel)
- Page 4, Travel: how are flights and any non-car related travel is to be claimed and charged.
- Page 5, Schedule 1, Maximum Fee: should this be “hourly rate” (is this a set fee?).

We note that the above is a summary of the points raised by ARPA WA members with regards to the consultation papers. We are happy to meet Workcover WA to go through these (and any other relevant points) in more detail.

We would like to take this opportunity to thank Workcover WA again for allowing the ability for ARPA WA to provide a response to these consultation papers.

Should you have any questions or seek clarity in any comments, please do not hesitate to contact Lisa Lange, Jo Stanes or myself.

Kind regards,



Robb Moffat
President, ARPA WA