

9 March 2023

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Mr Stephen Roderick  
Manager Provider Programs  
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Via email: [providers@rtwsa.com](mailto:providers@rtwsa.com)

Dear Mr Roderick

**ReturnToWorkSA – Proposed Mental Health Fee and Policy / Provider Fee Review 2023/24**

The Australian Psychological Society (APS) and ReturnToWorkSA (RTWSA) regularly consult on a variety of matters to achieve the best possible outcomes for South Australians with a work injury. We support the Scheme's mission to deliver the best quality care and treatment to injured workers and we appreciate the opportunity to formally respond to the current consultations regarding the RTWSA Proposed Mental Health Fee and Policy, and Provider Fee Review for 2023-24.

In making this submission, the APS has reviewed the consultation papers, including the proposed mental health fee schedule. We have also consulted with APS members from South Australia who have specific experience and expertise in providing psychological services within the Scheme. Below are the key discussion points from our review of the consultation documents and input from members:

- The APS has responded to many previous consultations regarding RTWSA fees. We have long noted the considerable difference in psychology fees between RTWSA and other compensable schemes in Australia, with RTWSA fees traditionally falling within the lower range in terms of hourly rates. The APS is therefore pleased with the changes to the proposed fee structure for 2023/24, noting an increase of 15.8% to psychology fees. The APS applauds RTWSA for recognising the need for this substantial increase which better reflects the important contribution of psychologists to the Scheme.
- APS members have previously raised concerns regarding a shortage of psychology providers within the RTWSA scheme, often citing the lower fee rate as discouraging. We are hopeful that higher remuneration rates will encourage more experienced psychologists as well as those with a recognised area of practice endorsement to work within the Scheme. We also believe that substantially increasing the fees has the potential to lower the risk to injured workers in terms of reducing waiting lists and ensuring injured people do not miss out on psychological services altogether.
- In addition, our previous submissions to RTWSA fee consultations have advocated for psychologists to be differentiated from other medical and allied health professionals who provide mental health services as an adjunct to their profession.

We have proposed that psychologists should be separated from allied health providers in terms of benchmarking service provision, as they are in other compensable schemes across Australia. We had previously argued that the market rate for psychologists is considerably different to that for allied health practitioners. However, this had not previously been reflected in the RTWSA fees, which we believed was a disincentive to psychologists from working in the Scheme.

- We are therefore pleased that the changes to the 2023/24 fee structure reflect the profession of psychology as separate from allied health professionals. We consider that these changes are a positive acknowledgement of psychologists as specific experts in mental health and wellbeing. Additionally, this change recognises that psychologists are integral to the mental health workforce, particularly in the areas of assessment, diagnosis and treatment.
- Further, APS members also continue to emphasise the importance of appropriately recognising travel time for the purpose of visiting clients who may either be incapable of meeting face-to-face with a practitioner, or for the purposes of in vivo exposure sessions at a site associated with anxiety, stress, or traumatisation. We note that the proposed RTWSA fee for travel time is \$174.30 per hour, which is significantly lower than the proposed standard consultation fee of \$228.70. When travelling to visit clients, psychologists cannot be providing services to other clients, including injured workers. In these circumstances, offering an even lower rate for travel time remains a disincentive for psychologists to participate in the Scheme and restricts the options for evidence-based best practice.
- We are also concerned that the lower rate for travel time may also act as a disincentive for the workplace attendance item, which is at the lower rate of \$162.90 per hour. This may act as a barrier to increasing workplace visits. The APS recommends that RTWSA amend the travel time and workplace visit rates within this context and align them with the fees for the delivery of the relevant intervention.

We remain open to collaborating with RTWSA regarding ongoing matters relevant to the profession of psychology and the RTWSA scheme. We offer our support to RTWSA in terms of communicating the changes to the fee structure to APS members and look forward to future partnership opportunities with RTWSA to develop appropriate resources and training to support psychologists (and other health practitioners) working within the Scheme. For example, the APS is well placed to provide professional development in areas such as:

- Working with complex cases and overcoming challenges engaging clients as they relate to return-to-work claims;
- Treating chronic pain;
- Post-traumatic Stress Disorder and Complex PTSD; and
- Organisational measures for vocational assessments

Thank you again for the opportunity to respond to the current consultation regarding the RTWSA psychology fees for 2023-24. Please don't hesitate to contact me, should any further information be required, on (03) 8662 3300 or [z.burgess@psychology.org.au](mailto:z.burgess@psychology.org.au).

Kind regards

**Dr Zena Burgess FAPS FAICD**  
Chief Executive Officer