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Ms Lorraine McIlwain
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Workers Compensation Regulatory Services
Office of Industrial Relations
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Submitted via email: lorraine.mcilwain@workcoverqld.com.au

Dear Ms McIlwain,

APS Response to the WorkCover Queensland Allied Health Services Table of Cost annual review 2023-2024

The Australian Psychological Society (APS) is pleased for the opportunity to contribute feedback to the WorkCover Queensland Allied Health Services Table of Cost annual review 2023-2024.

The APS supports the WorkCover Queensland Scheme and its aim to deliver expert and quality care to injured people. We remain dedicated to working with WorkCover Queensland to help achieve the best psychological outcomes for people who have experienced a work-related injury.

In preparing our response, we have drawn upon feedback previously provided by APS members who have specific experience and expertise in providing psychological services within the Scheme. We have also considered the specific questions posed by WorkCover Queensland in terms of the key areas of feedback that the consultation is centred on, including what is currently working well within the Scheme, what is not working well, and recommending various changes that we believe will benefit psychology providers and improve psychological outcomes.

Should any further information be required from the APS, please do not hesitate to contact me on (03) 8662 3300 or at z.burgess@psychology.org.au.

Yours sincerely,

Dr Zena Burgess FAPS FAICD
Chief Executive Officer

APS response to the WorkCover Queensland Annual review of Allied Health Services Tables of Costs for 2023-2024

The APS believes that one of the key benefits of the WorkCover Queensland TOC is that an initial consultation session can proceed without provider approval. Early intervention is critical to increase the potential of an injured worker returning to work. All claimants should have appropriate access to early intervention support. The initial consultation item and initiative for this first session to proceed without prior approval goes some way to ensuring injured workers receive access to early intervention services and support.

We also consider the inclusion of items for communication, case conference, travel and incidentals as practical and highly beneficial. Psychologists often consult with GPs, insurers, attend case conference sessions and travel to see clients onsite. Given that such activities form part of the standard responsibilities and requirements of psychologists working in the Scheme, it is important that they are recognised within the Psychology Services Table of Costs. However, the current costs pertaining to such activities are not fit for purpose and require review. We recommend a standard fee (pro-rata) for all psychology services, whether direct client contact or not, determined according to the time taken to complete the activity.

Initial and Subsequent Consultations Fees

We are concerned that the WorkCover Queensland psychology fees remain within the lower range of compensable schemes in Australia. APS members have previously raised concerns regarding a shortage of psychology providers within the Queensland Scheme, often citing the lower fee rate as a disincentive. This is particularly concerning in the context of a higher than usual demand for psychology services within the general community.

Ultimately, the lower fee rate offered by WorkCover Queensland appears to be discouraging more experienced psychologists, or those with additional training, from participating in the Scheme (including psychologists holding endorsement in clinical, counselling, neuropsychology or health psychology). Therefore, more injured workers than necessary are at risk of being on longer waiting lists or missing out on services altogether.

As a case study example, the APS notes that the Return to Work South Australian Scheme (RTWSA) and WorkCover Queensland psychology fees for a standard and subsequent consultation in 2022-2023 were amongst the lowest rates of all compensable Schemes in Australia. The current psychology fees and the proposed RTWSA psychology fees for 2023-2024 are outlined in Table 1 below:

Table 1.

Psychology fees payable by RTWSA and WorkCover Queensland for standard and subsequent consultations for 2022-2023 and 2023-2024

	2022-2023	2023-2024
RTWSA	\$197.50	\$228.70
WorkCover QLD	\$208	TBC

As outlined in Table 1, despite the proposed psychology fees remaining well below the APS National Schedule of Recommended Fees for psychological services (\$280 for a 46–60-minute consultation), we were pleased to see RTWSA have recently proposed to substantially increase their psychology fees by 15.8% for 2023/24. The RTWSA fees are now well above the standard and subsequent consultation fees for WorkCover Queensland. These changes are a step in the right direction to better reflect the important contribution of psychologists to the Scheme.

We recommend that WorkCover Queensland review the Tables of Costs for psychology from a similar perspective and incorporate appropriate changes to better align psychology fees to minimise the variation across compensable schemes in Australia. This would encourage more

experienced psychologists, as well as those with a recognised area of practice endorsement, to work within the Scheme. In addition, it is our view that substantially increasing psychology fees has the potential to lower the risk to injured workers in terms of reducing waiting lists and ensuring claimants receive the psychological support required to return to work in a timely manner.

Progress Report and Standard Report Fees

The APS also considers that the standardised fees to complete a progress report (\$66 per report) and standard report (\$167 per report) are too low and inappropriately set. Ultimately, these fees do not accurately reflect the time taken to complete the required report. We recommend setting a standardised fee based on the time spent on the activity (i.e., a standard per hour rate for all psychology services whether direct client contact, report-writing, travel, case conferencing etc), rather than being a set figure. Further, the fee to undertake these activities should align with the standard consultation fee for a psychologist. To discourage inappropriate billing for report writing, WorkCover Queensland may consider capping the fee for a maximum time.

Travel – Treatment Fees

Further, APS members have emphasised the importance of appropriately recognising travel time for the purpose of visiting clients who may be incapable of meeting face-to-face with a practitioner. We note that the current fee for travel time is \$140 per hour, which is significantly lower than the standard consultation fee. 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 recommend reviewing the travel time rate and aligning this with the standard consultation fees.

Did Not Attend Fees

We note that the WorkCover Queensland Psychology Services Table of Costs do not provide for a fee to be charged for a late cancellation or non-attendance by an injured person for treatment services. Whilst we note that many other Australian Schemes also do not offer this item as part of their schedule of fees, there is an opportunity for WorkCover Queensland to be innovative and provide a point of difference within their Scheme by introducing a 'did not attend' item – included in the number of eligible sessions for claimants.

Alternatively, WorkCover Queensland may benefit from providing more specific steps to best manage situations when clients consistently cancel or fail to attend appointments without a genuine reason. For example, many psychology practices have a 'two opportunities' policy, whereby future appointments may be cancelled, or the client is returned to a waitlist if they do not attend appointments without providing notice or if there are multiple cancellations with less than 24 hours' notice for non-emergency reasons. We believe it is important for clients to remain accountable for attending services or providing advice where a session must be cancelled or rescheduled at late notice. Repeated cancellations or no-shows result in psychologists being unable to provide services to other clients, including other injured workers.

Group Therapy Item

We draw WorkCover Queensland's attention to other compensation Schemes, such as SIRA and RTWSA, who provide item numbers for group therapy sessions. These items are appropriate for situations in which a psychologist may deliver a common service to a group of people, rather than an individual. This may include a group of workers or family members. It would be beneficial for WorkCover Queensland to include similar item numbers to better recognise and encourage the option of group interventions when appropriate.

Trauma Focused Psychological Treatment

A separate item for trauma focused psychological treatment may be worth considering. Exposure therapy is a long established evidence-based treatment for a range of presentations and the APS considers the provision of exposure therapy techniques (i.e., in vivo exposure and graded exposure) as a gold standard psychological approach for many return to work scenarios.

Exposure therapy should only be delivered by suitably trained and experienced psychologists. However, the current fee offered by WorkCover Queensland may discourage psychologists trained in the delivery of exposure therapy from participating in the Scheme. It is possible that this impacts on the quality of service provision to WorkCover Queensland clients, resulting in many injured workers not receiving effective gold standard care.

It is essential that the Tables of Costs encourage participation by psychologists experienced in the treatment and care of injured workers. We therefore recommend the inclusion of specific item numbers that recognise the delivery of exposure therapy and graded exposure, and which remunerate experienced psychologists accordingly.

These item numbers may also reflect differing therapeutic needs, such as when a psychologist travels to deliver in vivo exposure at a work site, as well as scenarios that warrant an extension of time beyond a standard consultation (i.e., 90 minute consultation sessions).

Provider Management Plans

The APS also notes that under the WorkCover Queensland Scheme, the insurer will not pay a fee for the completion of a Provider Management Plan (PMP). This is unlike other compensation schemes across Australia. We recommend including an item that provides an appropriate fee to reflect this work on the part of practitioners.