



AUSTRALIAN MEDICAL ASSOCIATION
(SOUTH AUSTRALIA) INC.
ABN 91 028 693 268

05 March 2021

Ms Linda Dirkzwager
Program Lead
Provider Regulation and Support
ReturnToWorkSA

E: providers@rtwsa.com

Dear Ms Dirkzwager

Re: AMA(SA) feedback to proposed changes to ReturnToWorkSA Fees

The Australian Medical Association (SA) (AMA(SA)), welcomes the opportunity to provide feedback to the proposed changes to ReturnToWorkSA (RTWSA) Medical Fees to take effect from 1 July 2021.

In preparing this submission, the AMA(SA) has consulted members and particularly members of the AMA(SA) RTWSA Reference Group.

The AMA(SA) supports the decision to increase General Practitioner (GP) attendance fees to the published Australian Medical Association (AMA) rates. This is an important step in appropriately recognising the costs and administrative burden associated with providing high-quality care in a complex work injury context.

The AMA(SA) also welcomes the proposal to adjust specialist medical practitioner attendance fees within the Medical 1A fee schedule to align with AMA recommended rates with a 20 per cent increase over two years. However, is RTWSA able to clarify whether the currently gazetted fees will increase to the current AMA rates and then increase by 10 per cent? Or will they align with AMA fees (as of 1st July 2021) and increase by 10 per cent in 2022-23, bearing in mind that AMA fees increase on 1 November annually?

Given the positive step in moving to AMA rates, the AMA(SA) proposes that there is a strong logical follow-on argument for similar, proportional increases in services listed in Schedule 1B, such as case conferences, worksite visits, impairment assessment, treating medical reports, independent medical reports, court attendances, and admin fees, even though these services do not map easily to AMA/Medicare items. Although this schedule is comprised of a mix of item numbers and hourly rates, the AMA(SA) believes that increases in this schedule are required to appropriately reflect the costs of providing such services as part of the RTWSA scheme, consistent with the moves to align fees with AMA rates.

Members note concerns around the surge in complexity of workers presenting for specialist evaluation (on referral from GPs, Allied Health Professionals, Insurers or Rehabilitation Providers) with regard to occupational history. These cases often require specialists to make a judgment as to which of the most recent employers was capable of causing a compensable condition. Specialists note that the administrative and professional complexity associated with addressing this issue is not reflected in the AMA specialist fee. They also question the costs and quality associated with engaging fly-in-fly-out specialists in contested compensation cases. They note that the quality of histories, particularly occupational history, notation and opinions

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provided about magnitude of loss is often inconsistent with standard procedures. This results in additional independent reports required, additional court appearances, and inevitably, cost. Other inefficiencies in the system include delays in clinical treatment due to administrative oversight which means the files of these work injury claims must be reviewed in their entirety. This additional time for the treating doctor is not compensable.

The AMA(SA) suggests that the consultation fee component for Permanent Impairment Assessments (PIA) and Independent Medical Exams (IME) should increase commensurately with the rise in consultation fees. PIA Fees have not altered with regard to reports, reading time, court appearance etc and the reading fee in particular is not adequate for the long and complex reports – often 400+ pages that must be read. In addition, highly complex PIAs such as those involving multiple body parts, multiple injury dates and evaluations of pre-existing complaints, should be remunerated at a higher level, reflecting the greater cost, complexity and professional expertise in providing the service. Member consultation identified the need for a new item number created for complex IME or Treating Doctor report which would allow for the more complicated and in-depth reports that are sometimes required.

The AMA(SA) looks forward to learning the outcome of the review, and we would also like the opportunity to discuss the proposals and some more specific concerns of members in future meetings with you. We are committed to working with RTWSA for a high-quality work injury system that delivers results for patients, practitioners, and the South Australian community.

If I can be of further assistance, or you would like to schedule a meeting, please contact me via my Executive Assistant, Mrs Claudia Baccanello, on 8361 0109 or at claudia@amasa.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Moy', with a stylized flourish underneath.

Dr Chris Moy
MB BS, FRACGP, FAMA, AMA(M)

President