

From: [REDACTED]
To: [WorkCover WA New Act Consultation](#)
Cc: [REDACTED]
Subject: Att Manager Policy and Legislative Services - Submission from Incite Solutions Group re Consultation Papers
Date: Friday, 8 December 2023 2:19:14 PM
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Good afternoon,

We appreciate the opportunity to provide feedback on the Implementation Proposals for regulations and administrative instruments, specifically focusing on Consultation Papers 12, 6, and 26. Our detailed observations and recommendations are outlined below:

Implementation Consultation Paper 6: **Injury Management and Return to Work**

1. In relation to Return to Work (RTW) case conferencing, we suggest allowing flexibility for these conferences to occur outside the set 4-week period if all parties involved agree. This adjustment would facilitate more efficient and tailored case management.
2. Regarding the Notice to attend RTW Case Conference form, we propose flexibility in its issuance. While compliance is essential, the form could be reserved for cases where there is an issue with compliance, avoiding unnecessary administrative burden in cases where attendance is unproblematic.

Implementation Consultation Paper 12: **Workplace Rehabilitation Services**

1. Within the section *When workplace rehabilitation is reasonably necessary*, we note the statement that there is no intention to prescribe a time period or stage in the claim or RTW process for when workplace rehabilitation involvement should be considered. We propose the inclusion of a statement in support of early intervention within the regulations. Early referral to workplace rehabilitation is a critical aspect often associated with positive outcomes. Incorporating expectations for early intervention would enhance the effectiveness of the regulations.
2. Regarding the insurer's providing a list of approved workplace rehabilitation providers to injured workers, we recommend specifying providing the list on the WorkCover WA website rather than a list of WRPs who may be on insurer panels.
3. There is a statement that regulation will not include change of provider. We seek clarification on whether this implies that changing a provider is no longer possible under the proposed regulations.

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

1. Concerning travel requirements, we seek clarification on whether recording date, distance, and time travelled within a case note would be considered sufficient evidence, thus eliminating the need for a physical logbook.
2. We highlight the potential risk of discouraging face-to-face servicing if providers cannot charge for the return trip of an appointment. Face-to-face interactions play a crucial role in building rapport and effective communication. We recommend a reconsideration of this limitation.
3. Regarding transitional information, we seek clarification on whether return travel charges will

continue to be applied for cases within the system prior to the implementation of WCIMA23.

We appreciate your consideration of our feedback and look forward to contributing to the refinement of these important proposals.

Thank you for your time and attention.

Kind Regards,

Claudia

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