



23 January 2024

Mr Chris White
Chief Executive Officer
Workcover WA
2 Bedbrook Place, Shenton Park
Perth WA 6008

By email: consultation@workcover.wa.gov.au
chris.white@workcover.wa.gov.au

Dear Chris,

**Written Submissions: Implementation Consultation Paper 25
Workers' Compensation and Injury Management Act 2023 (WA)**

GIO has provided feedback via the ICA on a combined basis as a part of the consultation process on the proposed Regulations to support the *Workers Compensation and Injury Management Act 2023 (WA)* (WCIMA 2023).

In addition, please find attached a table containing GIO feedback on specific aspects of paper 25

We trust that our contribution is of assistance to WorkCover WA in implementing the changes in WCIMA 2023. We look forward to working with the WorkCover WA into the future regarding these and any other relevant aspects of the Papers.

We are available to discuss our submission and any questions that may arise in more detail at your convenience.

Yours sincerely,



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Vero and GIO Workers Compensation are part of the Suncorp Network

Implementation consultation paper 25:

| Implementation consultation papers | Section/page number referenced | GIO submissions |
|-------------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Paper 25: Fees Order for Allied Health Services | Table 1 – Page 5 – Exercise Based Services | The table groups together Exercise Based Services provided by Physiotherapists and Exercise Physiologists as having the same fee. Currently, these are invoiced under two different codes. Can clarification be provided as to if these will remain as separate codes with the same pricing, or will there be one code for the service regardless of the provider type? |

| Implementation consultation papers | Section/page number referenced | GIO submissions |
|-------------------------------------------------|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Paper 25: Fees Order for Allied Health Services | Table 1 – Page 6 – Physiotherapy | <p>Currently, and duplicated in the proposed service fees, no duration has been specified for the initial or standard physiotherapy consults. This has been an area of confusion with both providers and insurers uncertain as to how long a session should be. It has resulted in some providers billing a single consult for an hour-long session, while others have billed two units for the same one-hour period.</p> <p>The session lengths for occupational therapy, speech pathology and psychology have all been removed, whereas Exercise Physiology specifies the consultation rates are by hour.</p> <p>Respectfully, we submit that the session lengths are specified for all providers or, considering the similarity of the services provided, the session length is specified at least for physiotherapy services to make it more consistent with exercise-based services.</p> |