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3 October 2024

**Attention:** The Hon Anika Wells MP

**Copy:** The Hon Mark Buttler, MP

Ms Anita Hobson-Powell, Chief Allied Health Officer

**Via Ministerial online enquiry form and email:** [caho@health.gov.au](mailto:caho@health.gov.au)

**Sender:** Antony Nicholas

Chief Executive Officer

Osteopathy Australia

Dear Minister,

I write to you with profound disappointment about the exclusion of osteopathy as a part of the 'allied health and therapy' service type in the Aged Care Bill 2024, Service List<sup>1</sup> and the Independent Health and Aged Care Pricing Authority (IHACPA) indicative Support at Home service list<sup>2</sup>.

The various reforms underway across the health, aged care and disability sectors show a lack of understanding, or consistency within the Federal Government and its departments, of what is widely considered an allied health professional. The Scope of Practice Review<sup>3</sup> highlighted the need to harmonise many terms across jurisdictions, departments, various third parties and funding schemes. Currently, there is no national clarity about who is considered an allied health professional and who is not. The lack of consistency is one of the significant barriers to providing best-practice multidisciplinary care. This inconsistency appears to be continuing rather than heeding draft recommendations from reviews in an effort to ensure broader harmonisation.

Various credible sources, including your own departments such as the Department of Health and Aged Care<sup>4</sup>, the Australian Health Practitioner Regulation Agency (Ahpra)<sup>5</sup> and Allied Health Professions Australia (AHPA)<sup>6</sup>, acknowledge osteopathy as an allied health profession. In addition, osteopathy is a federally funded allied health service under the Medicare Benefits Schedule (MBS)<sup>7</sup>, MBS Chronic Disease Management items<sup>8</sup> and the Department of Veterans' Affairs (DVA)<sup>9</sup>. As you can see by the extensive list of references underpinning the validity of our claims, osteopathy is an integral allied health profession that must be included under the 'allied health and therapy' service type of the Aged Care Bill 2024.

Allied health professions require a minimum AQF7 university-level education. Osteopaths are university-qualified allied health professionals regulated by the Australian Health Practitioner Regulation Agency (Ahpra). Allied Health Professions Australia also recognise osteopaths as allied health professionals. Osteopaths complete either a dual bachelor's or bachelor's and master's qualification covering functions of anatomy, biomechanics, human movement, the musculoskeletal and neurological systems, as well as clinical intervention approaches, which are all underpinned by a biopsychosocial management approach. Most Australian osteopaths hold an AQF9 qualification.

Osteopaths are integral to the multidisciplinary allied health team and play a pivotal role in the preventative care of older Australians. Indicative service lists<sup>1,2</sup> omit the inclusion of vital health professionals like osteopaths under the 'allied health and therapy' service type of the Aged Care Bill 2024. Instead, osteopaths are grouped under the 'therapeutic services for independent living' service type and will be excluded from providing older Australians with the essential care they need. Further, the price cap on the 'Independence' category for the Support at Home program is indicative that older

Australians will pay more out of pocket for essential care like osteopathy. In a cost-of-living crisis, this is unsustainable and inequitable for older Australians.

At a time when significant aged care workforce shortages are being identified, it is deeply concerning that a highly skilled and experienced workforce of allied health professionals is omitted from providing older Australians with the care they need. By failing to include osteopathy in the 'allied health and therapy' service type, older Australians will no longer receive care that is funded by Government. Older Australians must now significantly contribute to the cost of care they receive, which was highlighted in our recent submission to the Aged Care Bill 2024 consultation.

Older Australians unable to afford care pivotal to their quality of life will experience detrimental impacts on their health in the areas of care that osteopaths provide, such as fall prevention and management, mobility, pain prevention and management, manual therapy, exercise prescription and other evidence-based techniques to improve functional capacity and Activities of Daily Living (ADL).

Given the impacts we are already seeing because of these reforms, we respectfully urge you to prioritise the inclusion of osteopathy in the 'allied health and therapy' service type. Prompt action is necessary to help improve the already thin allied health service market and ensure older Australians receive equitable, best-practice multidisciplinary allied health care. Your attention to this matter is greatly appreciated and we look forward to working with you to ensure the equitable inclusion of osteopathy in the Aged Care Bill 2024 and the service lists.

Sincerely,

Antony Nicholas

CEO, Osteopathy Australia

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<sup>1</sup> Department of Health and Aged Care. New Aged Care Act Rules consultation – Release 1 – Service list [Internet]. 2024. Available from: <https://www.health.gov.au/resources/publications/new-aged-care-act-rules-consultation-release-1-service-list>

<sup>2</sup> Independent Health and Aged Care Pricing Authority. Pricing approach for the Support at Home service list 2025—26 consultation paper [Internet]. Available from: <https://www.ihacpa.gov.au/aged-care/home-aged-care/pricing-approach-support-home-service-list-2025-26-consultation-paper#:~:text=The%20Support%20at%20Home%20service%20list>

<sup>3</sup> Department of Health and Aged Care. Unleashing the Potential of our Health Workforce – Scope of Practice Review [Internet]. 2024. Available from: <https://www.health.gov.au/our-work/scope-of-practice-review>

<sup>4</sup> Department of Health and Aged Care. About allied health care [Internet]. 2023. Available from: <https://www.health.gov.au/topics/allied-health/about#allied-health-workforce-statistics>

<sup>5</sup> Osteopathy Board of Australia [Internet]. 2024. Available from: [https://www.osteopathyboard.gov.au/?\\_gl=1\\*5v6p67\\*\\_ga\\*MTc2NjI2MTU0My4xNzAwMDI3MTM1\\*\\_ga\\_F1G6LRCHZB\\*MTcyNzY2MTI4Mi44MC4wLjE3Mjc2NjEyODQuMC4wLjA](https://www.osteopathyboard.gov.au/?_gl=1*5v6p67*_ga*MTc2NjI2MTU0My4xNzAwMDI3MTM1*_ga_F1G6LRCHZB*MTcyNzY2MTI4Mi44MC4wLjE3Mjc2NjEyODQuMC4wLjA)

<sup>6</sup> Allied Health Professions Australia. Allied health regulation [Internet]. 2024. Available from: <https://ahpa.com.au/allied-health-accreditation/#:~:text=The%20allied%20health%20professions%20currently%20registered%20with%20AHPRA,radiation%20practice%20Occupational%20therapy%20Optometry%20Osteopathy%20Pharmacy%20Physiotherapy>

<sup>7</sup> Department of Health and Aged Care. MBS Online [Internet]. 2024. Available from: <https://www9.health.gov.au/mbs/search.cfm?q=osteopathy&Submit=&sopt=S>

<sup>8</sup> Department of Health and Aged Care. MBS Online [Internet]. 2024. Available from: <https://www9.health.gov.au/mbs/fullDisplay.cfm?type=item&q=10966#:~:text=Medicare%20benefits%20are%20available%20for>

<sup>9</sup> Department of Veterans' Affairs. Osteopaths [Internet]. 2024. Available from: <https://www.dva.gov.au/get-support/providers/dental-psychology-allied-health-professions/osteopaths#:~:text=If%20you%20are%20unsure%20whether%20a%20DVA%20client>