

Aligning contractual requirements for vocational rehabilitation providers in Victoria

**Submission and business case by Osteopathy Australia to:
The Victorian Transport Accident Commission (TAC)**

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Contact

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Recommendation

1. That the policy division of the Victorian TAC align its contractual requirements for vocational rehabilitation providers with WorkSafe Victoria, enabling osteopaths to be engaged from commencement of the new contract lifecycle in October 2021.

About us

Osteopathy Australia is the peak body representing the interests of osteopaths, osteopathy as a profession, and consumer's rights to access osteopathic services. We promote standards of professional behaviour above the requirements of AHPRA registration. A vast majority of registered osteopaths are members of Osteopathy Australia.

Our core work is liaising with state and federal government, and all other statutory agencies, professional bodies, and private industry regarding professional, educational, legislative, and regulatory issues.

In our capacity, we welcome the opportunity to provide a submission and business case to the Victorian TAC. Our submission consolidates feedback from engagements with several vocational rehabilitation providers, explaining how the profession can contribute to provider operations benefiting the Victorian state.

About the osteopathy profession

Osteopaths in Australia are government (AHPRA) regulated allied health professionals having inbound and outbound referral relationships with other health professionals.

Osteopaths complete a dual Bachelor or Bachelor/Masters qualification covering functional anatomy, biomechanics, human movement, the musculoskeletal and neurological systems as well as functional assessment, clinical management, and rehabilitation. Significant commonalities exist between the health science units undertaken by osteopaths and those undertaken by peers of other allied health professions, including musculoskeletal physiotherapy and exercise physiology.

The osteopathic profession emphasises the neuromusculoskeletal system as integral to client function and uses client-centred biopsychosocial approaches in managing functional limitations from transport accidents and barriers to returning clients to work. Evidence informed reasoning is fundamental to case management and clinical intervention. Osteopaths perform activity based functional assessments, prescribe skilled clinical exercise, pacing approaches, work hardening activities, health promotion strategies, and other interventions aimed at enhancing functional skills.

The *Capabilities for Osteopathic Practice (2019)* outline the required capabilities for professional skill, knowledge, and attributes; osteopaths are required to possess many professional skills common across allied health and health professions. Per the capabilities, on graduating an osteopathy course of tertiary study in Australia, a registrant must be able to perform the following interdisciplinary clinical roles:

- Apply knowledge of clinical and biomedical sciences relevant to human health and function, psychosocial and physical environmental determinants of health, activity limitations and participation restrictions when planning, implementing and reviewing client care
- Implement, monitor and review evidence-based interventions including manual therapy, rehabilitation, pain education and health promotion
- Enable and empower clients to enhance their participation in work and other life roles
- Ensure clients are not discriminated against based on their age, culture, disability, gender, sexuality, social status, economic status, language or ethnicity, consistent with legislative requirements
- Explain and negotiate planned assessments including risks and options with patients/clients and relevant others.
- Incorporate the key bio-psychosocial and environmental factors that contribute to clients' wellbeing (impairment, disability and participation) when planning, implementing and reviewing client care
- Negotiate a safe and appropriate management plan with the client and relevant others, including discussion of options for management
- Implement, monitor and review client-centred management plans that include relevant therapeutics such as manual therapies, rehabilitation, pain education, exercise and cognitive interventions, using the best available evidence and technologies to inform practice
- Establish a prognosis in conjunction with clients and relevant others that incorporates appropriate outcome measures and anticipated milestones of client progress
- Recognise when further information/referral is required and facilitate this to occur
- Recognise and effectively manage conflicts of interest, including unnecessary prescription of products and over-servicing
- Assess risk in designing and monitoring patient/client care
- Advocate for patients/clients and their rights to healthcare and other services

- Contribute to the effectiveness and efficacy of the healthcare system, including wise use of healthcare resources, and ensure that the services provided are reasonably required and not excessive or unnecessary
- Use effective, culturally safe communication to establish a therapeutic relationship that encourages patient/client trust and autonomy and is characterised by empathy, respect and compassion
- Facilitate change informed by the best available research evidence and a clients' needs when new ways of working are adopted in the practice context.
- Assist clients and their families to identify, access and make use of information and communication technologies to support their care and maintain their health
- Effectively use a range of communication skills, including but not limited to, negotiation, conflict management and resolution to facilitate positive working partnerships with patients/clients and relevant others
- Critically appraise, interpret and apply learning from CPD, clinical data and client responses
- Provide health education to patients/clients to promote health and prevent disease/illness
- Demonstrate a commitment to principles and approaches which address the wider health determinants of patients/clients in the community
- Evaluate the effectiveness of the education provided to patients/clients and modify the content and delivery methods where appropriate to facilitate patient/client compliance
- Work with patients/clients and relevant others when necessary to enable patients'/clients' access to appropriate health and community services
- Interact effectively and professionally with other health and community services and/or providers in the interests of patients/clients

- Maintain knowledge of other health services relevant to patient's/client's care and seek assistance when information is outside their expertise to enhance healthcare and collaboration.ⁱ

Background to this submission and business case

In November 2020, WorkSafe Victoria, recognising the appropriateness of osteopaths within vocational rehabilitation, changed its *Conditions of Statutory Approval 2021-2024*. This change will allow osteopaths to be employed/engaged by WorkSafe vocational rehabilitation providers from July 2021. This change will mean Victorian providers and/or cross-jurisdictional national providers in Victoria will have inconsistent contractual requirements between the two largest state based vocational rehabilitation programs.

With the status quo continuing, vocational rehabilitation providers would be forced to undertake onerous practitioner case allocation administration. Specifically, providers would need to put more work into separating their workforces by awarded Victorian agency contract, preventing use of their full workforces and creating inefficiencies where new public sector contracts are secured requiring potential practitioner redeployment. More is said about this under **supporting argument c** of the business case.

Recommendation and business case points

1. That the policy division of the Victorian TAC align its contractual requirements for vocational rehabilitation providers with WorkSafe Victoria, enabling osteopaths to be engaged under the new TAC contract lifecycle in October 2021.

Supporting argument a): strong alignment between registrant capabilities and vocational rehabilitation provider work

The *Capabilities for Osteopathic Practice* signify the general suitability of osteopathy registrants to service delivery environments requiring biopsychosocial rehabilitative reasoning for client community participation.

Each capability is essential in vocational rehabilitation provider services, contributing to core provider contractual requirements. The capabilities necessarily lend themselves to working with diverse clients, their families or carers, reviewing management plans developed by providers and/or other health professionals, exploring biopsychosocial strategies for return to work and/or work hardening, performing functional assessments, and, adopting a measurable and timed focus for vocational outcomes, as some examples.

A majority of osteopathy registrants complete courses in Victoria at RMIT or Victoria University. In meeting the *Capabilities for Osteopathic Practice*, we are aware each university in specific electives or interspersed throughout osteopathy degrees, offer learning on job task analysis and pre-employment screening, worksite assessment, ergonomic assessment, biopsychosocial assessment and risk analysis, functional assessment, manual handling, and general workplace risk assessment.

The TAC should trust that provider recruitment and probity processes will enable differentiation of the most appropriate osteopaths, much as these processes differentiate between physiotherapists and exercise physiologists for consultancy employment or engagement.

Supporting argument b): high service impact potential

Most registered osteopaths reside and work in Victoria (1640 practitioners or 60% of all osteopaths in 2019-2020).ⁱⁱ

Given practitioner numbers, we project that osteopaths would have a measurable impact on provider access, transition and exit timeframes, place downward pressure on wait times, and increase the allied health professional workforce TAC approved providers can draw from in meeting agency service delivery obligations.

Supporting argument c) removing inconsistent red tape ensures viable provider operations across Victorian agency and other contracts

Through our discussions with a range of vocational rehabilitation providers, we understand there is need for greater allied health workforce attraction and retention.

Several providers have flagged difficulty attracting qualified allied health professionals across all professions. Any workforce shortages would cause preventable untimely delays in client triage, assessment, and case management. The longer a person is off or out of work, the less likelihood of returning and the higher overall TAC costs for income maintenance and health or social interventions.

Osteopaths, being highly qualified allied health professionals, would assist in optimising provider contractual outcomes and in minimising high scheme long term costs.

Further, the TAC may be aware of the impending establishment of the National Disability Insurance Scheme's (NDIS) Independent Assessments. Some large Victorian providers of vocational rehabilitation services have tendered successfully to deliver these assessments; the scale of the NDIS contract could place pressure on providers already experiencing talent attraction and retention difficulties, namely, the pressure to redeploy a constrained workforce between contracts. We content that osteopaths would provide a new supply source for allied health professionals, and therefore, assist provider viability across their varied government contracts.

References

ⁱ Osteopathy Board of Australia, *Capabilities for Osteopathic Practice (2019)* [online]; <https://www.osteopathyboard.gov.au/Codes-Guidelines/Capabilities-for-osteopathic-practice.aspx> (pages 11-17)

ⁱⁱ Osteopathy Board of Australia, *Osteopathy in 2019-2020; summary data tables* [online]; <https://www.osteopathyboard.gov.au/Codes-Guidelines/Capabilities-for-osteopathic-practice.aspx> (pages 11-17)