

Exercise Physiology Fee Review 2024

**ReturnToWorkSA (RTWSA)
Government of South Australia
8 March 2024**

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EXERCISE & SPORTS SCIENCE AUSTRALIA (ESSA) SUBMISSION

RE: EXERCISE PHYSIOLOGY FEE REVIEW 2024

Dear, ReturnToWorkSA

Thank you for the opportunity to provide feedback concerning the ReturnToWorkSA annual fee review for the Exercise Physiology Fee Schedule.

Exercise & Sports Science Australia (ESSA) is the peak professional association for exercise and sports science professionals in Australia, representing more than 11,000 members, including university-accredited Accredited Exercise Physiologists, Accredited Sports Scientists, Accredited High-Performance Managers and Accredited Exercise Scientists.

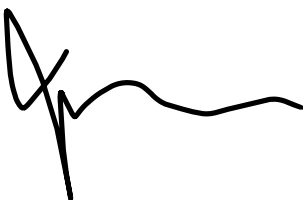
ESSA welcomes an increase in the fee schedule, partially in line with the Consumer Price Index (CPI) and the amendment to (EP905) fee descriptor to have parity with the other allied health travel descriptors. However, improvements could be made to the Exercise Physiology Fee Schedule to better support providers to deliver evidence-based clinical exercise treatment services for injured workers.

The current fee schedule creates barriers to accessing exercise physiology services, which hinders injured workers in South Australia from navigating the system and integrating services through multi-disciplinary teams.

ESSA is submitting evidence-based solutions to these issues, which will provide parity across allied health professions.

We welcome the opportunity to provide further detail and look forward to a response to the issues raised in this submission. Please contact ESSA Senior Policy & Advocacy Advisor Jacintha Victor John on 07 3171 9669 or at jacintha.victorjohn@essa.org.au for further information or questions arising from the following submission.

Yours sincerely



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1.0 ABOUT EXERCISE PHYSIOLOGY

Accredited Exercise Physiologists (AEPs) are at least four-year university degree qualified allied health professionals. They provide services to people across the full health spectrum, from the healthy population through to those at risk of developing a health condition, people with mental and physical health conditions, a disability, and aged related illnesses, including chronic, complex conditions [1]. Exercise physiology services are recognised by Australian compensable schemes including Medicare, the National Disability Insurance Scheme (NDIS), Department of Veteran Affairs (DVA), workers' compensation schemes and private health insurers. At the latest ESSA renewal in February 2024, there are over 500 AEPs in South Australia, with 37.9 % working within ReturnToWorkSA (RTWSA) workers compensation schemes [2].

2.0 SUMMARY OF RECOMMENDATIONS

Recommendation 1: ESSA recommends that ReturnToWorkSA provide data to ESSA demonstrating that Medicare sessions from exercise physiologists are 30 minutes.

Recommendation 2: ESSA recommends that ReturnToWorkSA provide equal payment for Workplace Visits delivered by all allied health professionals.

Recommendation 3: ESSA recommends that ReturnToWorkSA increase the hourly rate for travel time for AEPs to match the hourly rate for travel for allied health professionals.

Recommendation 4: ESSA recommends that ReturnToWorkSA takes steps to explore the development of an item number to provide payment or part payment for sessions where income is lost due to sessions cancelled at short notice or where workers fail to attend sessions without notice.

3.0 BENCHMARKING OF EXERCISE PHYSIOLOGY FEES 2024

The Provider Fee Review 2024-2025 Consultation Paper indicated that the fee schedule is formulated using data provided by Medicare Australia, which is used to calculate the Average Private Charge (APC) for the relevant services.

ESSA notes RTWSA response from 2023 stating:

'We do not support the recommendation for Exercise Physiology fees to have parity with other allied health fees. As you know, the Return to Work Act 2014 (the Act) requires us to base fees on the average charge to a private patient and we utilise Medicare data as the basis for determining the average private charge. Analysis of Medicare data shows that the average private charge for Exercise Physiology services remains lower than the other allied health groups' [3].

ESSA continues to have concerns about the assumptions used to determine APC with Medicare data as a benchmark for determining the hourly rate for Exercise Physiology services.

ESSA purchased Medicare Average Private Charge data for allied health professionals [4] from Services Australia from 1 January 2022 to 31 December 2022. This data was presented and discussed with RTWSA during a meeting held in June 2023. During this meeting, it was revealed that the hourly rate, which was set as 2 x 30 minutes, was originally based on a consultation with ESSA when the fee schedule was first introduced. However, it was noted that this information is no longer valid as clinical practice has evolved since then.

The data below was processed on 15 May 2022, and the late arrival of this information meant that it could not be included in the 2023 ESSA submission. Below is the relevant information that proves our case for change, with almost the same private charge via MBS for exercise physiology and physiotherapy. According to this data, the private charge for occupational therapy is higher. Services Australia also advised ESSA that they do not collect information in relation to time.

Services Australia Medicare Average Private Charge data for Allied Health Professionals[4]

MBS ITEM	STATE	TOTAL SERVICES	TOTAL CHARGE	AVERAGE CHARGE
10953 – exercise physiology	SA	25,117	\$1,505,623	\$60
10953 – exercise physiology	National	284,595	\$19,564,546	\$68
10958 – Occupational Therapy	SA	3,515	\$476,487	\$136
10958 – Occupational Therapy	National	71,439	\$8,813,678	\$123
10960 - physiotherapy	SA	207,057	\$12,607,989	\$61
10960 - physiotherapy	National	2848,200	\$192,234,183	\$67

We have shared this evidence to assist RTWSA in making an informed decision. This data is obtained from Services Australia, and it shows that exercise physiology does not charge lower than physiotherapy. Therefore, the statement made by RTWSA in their response to ESSA, which says that "exercise physiology charging is lower than that of other professions," is incorrect. This assertion is based on the evidence presented above.

Additionally, all businesses employing AEPs are required to pay them the same as all other allied health professionals, which means that the lack of price parity issues makes exercise physiology less viable. In simple terms, if a business is required to pay two allied health professionals with identical credentials the same wage, and both professionals have similar operating costs and training and development costs, yet one generates \$42.50 [5, 6] less in revenue per hour, then that professional is significantly less financially sustainable. This poses a future risk to the availability of exercise physiology for injured workers as employers make business decisions amid rising inflationary pressures.

ESSA acknowledged RTWSA's response from 2023, [3] however, there continues to be disparity as evidenced in our previous submission for the following reasons [7]:

- AEPs are paid at the same rate as allied health professions in workers compensation schemes in other comparable jurisdictions.
- Services Australia has written to advise ESSA that they cannot provide data on 'Minutes delivered per service' [8], and therefore, Medicare does not have data on minutes.
- All allied health professions are provided with the same rebates in Medicare.
- [Health Professionals and Support Services Award 2020](#) requires AEPs to be paid the same as other allied health professions.
- Medicare fee schedule state that a consultation for 10953 is 20 minutes.

Recommendation 1: ESSA recommends that ReturnToWorkSA provide data to ESSA demonstrating that Medicare sessions from exercise physiologists are 30 minutes.

4.0 CURRENT FEE SCHEDULE

4.1 Workplace visit

The fee schedule for workplace visits for physiotherapy, Occupational therapy and exercise physiologists is listed below.

Exercise Physiologist Workplace Service Descriptor

EP216	Workplace visit	\$162.90 per hour
	Workplace visit. Review of the worker and workplace demands in accordance with the Clinical Framework for the Delivery of Health Services, for the purpose of determining ongoing treatment needs and where appropriate, reviewing movement patterns and techniques with work duties. The worker is to be present at the visit and for the best outcomes, the claims manager, supervisor/employer should also be present to facilitate a team approach. Maximum 1 hour.	Max 1 hour

Physiotherapy Workplace Visit Service Descriptor Fee Schedule

PT216	Workplace visit	\$205.40 per hour
	Workplace visit. Review of the worker and workplace demands in accordance with the Clinical Framework for the Delivery of Health Services, for the purposes of determining ongoing treatment needs and where appropriate, review movement patterns and techniques with work duties. The worker is to be present at the visit and for the best outcomes, the claims manager, supervisor/employer should also be present to facilitate a team approach. Maximum 1 hour.	Max 1 hour

Occupational Therapy Workplace Visit Service Descriptor Fee Schedule

OT216	Workplace visit	\$205.40 per hour
	Workplace visit. Review of the worker and workplace demands in accordance with the Clinical Framework for the Delivery of Health Services, for the purpose of determining ongoing treatment needs and where appropriate, reviewing movement patterns and techniques with work duties. The worker is to be present at the visit and for the best outcomes, the claims manager, supervisor/employer should also be present to facilitate a team approach. Maximum 1 hour.	Max 1 hour

Reviewing the fee descriptor for allied health professions such as Physiotherapy and Occupational therapy highlighted above indicates an apparent discrepancy between the workplace visit fees charged for exercise physiologists and those charged for other allied health professions [8]. Exercise physiologists provide the same service as physiotherapists but are being paid over \$40 per hour less.

The legislation for the same job, same pay [9] principle promotes the idea that equal pay should be provided for equal work. This aims to address pay disparities and promote workplace equality, which is fair and reasonable. It is unjust and unreasonable to deny equal pay for similar roles.

Recommendation 2: ESSA recommends RTWSA provide equal payment for Workplace Visits delivered by all allied health professionals.

4.2 Travel Time

ESSA has acknowledged RTWSA's response from 2023, which RTWSA stated that it does not support the recommendation to increase the hourly rate for travel time to the same hourly rate elsewhere in the exercise physiology schedule. RTWSA has also emphasised its position to remain consistent with what was

communicated in 2022. ESSA members, however, are still experiencing financial disadvantage due to inadequate travel remuneration and rising inflationary costs to maintain a clinic.

There are inequities in the system where other allied health professions are paid \$174.30 per hour for their travel and exercise physiologists are paid \$138.30 per hour for travel [5, 10]. There is no rationale provided on why this discrepancy exists for non-treatment time and reinforces the message that AEPs are of less value than other allied health in the scheme.

Recommendation 3: ESSA's position remains the same and recommends increasing the hourly rate for travel time for AEPs to match the hourly rate for travel for allied health professionals.

4.3 Non Attendance or Cancellation

ESSA notes the RTWSA response from 2023 stating that non-attendance or cancellation is a business risk that needs to be managed through appropriate business processes.

ESSA members are still experiencing financial disadvantage due to continued cancellations at short notice or no notice. Businesses have put in measures to minimise this risk, but it continues to occur. This reduces business viability to deliver services for injured workers and creates financial stress. The situation has been compounded in recent times due to rising inflationary costs. ESSA's submission from 2023 outlines a suggested alternative that could alleviate this business risk for providers [7].

Recommendation 4: ESSA recommends that RTWSA takes steps to explore the development of an item number to provide payment or part payment for sessions where income is lost due to sessions cancelled at short notice or where workers fail to attend sessions without notice.

6.0 CONCLUSION

Improvements should be made to the exercise physiology fee schedule to optimise access to treatment services for injured workers and encourage full engagement of the profession within the multi-disciplinary team.

7.0 REFERENCES

1. Exercise & Sports Science Australia, *Accredited Exercise Physiologist Scope of Practice*. 2021.
2. Dungog, J., *ESSA Workers Compensation Scheme*, in *Excel, --W.C. Scheme*, Editor. 2024, ESSA Data Analyst: ESSA.
3. RTWSA, *ESSA - Letter Response to fee Consultation Sub 19 June* ReturntoWorkSA, Editor. 2023.
4. Australia, A.G.S., *RM2907: The Average Private Charge for allied health professionals 2022*.
5. RTWSA. *Physiotherapy Fee Schedule and Policy 2023-24* [cited 2024 29/02]; Available from: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.rtwsa.com/data/assets/pdf_file/0004/99427/physiotherapy-fee-schedule.pdf.
6. RTWSA. *Occupational Therapy Fee Schedule and Policy 2023-24* [cited 2024 29/02]; Available from: chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.rtwsa.com/data/assets/pdf_file/0011/99407/occupational-therapy-fee-schedule.pdf.
7. ESSA, *Exercise Physiology Fee Review 2023 ReturnToWorkSA 10 March 2023*. 2023. p. 8.
8. ReturntoWorkSA. *Fee Schedules*. 2023 [cited 2024 16/02]; Available from: <https://www.rtwsa.com/service-providers/provider-registration-and-payments/fee-schedules>.
9. Australia, T.P.o.t.C.o. *Fair Work Amendment (Same Job, Same Pay) Bill 2021*. 2021 [cited 2024 06/03]; Available from: <https://classic.austlii.edu.au/au/legis/cth/bill/fwajspb2021335/>.
10. SIRA. *Accredited Exercise Physiology Fees and Practice Requirements 2023* [cited 2024 15/01]; Available from: Accredited exercise physiology fees and practice requirements (effective 1 February 2023) (nsw.gov.au).