



24 March 2014

Ms Jenny Jackson
Program Officer
WorkCoverSA
GPO Box 2668
ADELAIDE SA 5000

Via email: jjackson@workcover.com

Dear Ms Jackson

Re: Vocational Assessment and the Return to Work Schedule

The Institute of Private Practising Psychologists (IPPP) and the Australian Psychological Society (APS) wish to thank the WorkCover Corporation for accepting our feedback recommending that the service of Vocational Assessment be reinstated. Nonetheless, we remain significantly concerned about some of the details in relation to this service and feel compelled to write to you seeking to have these concerns addressed.

Until this year, the Vocational Assessment service had clear standards outlined for it, chief of which was that it included utilisation of validated psychometric tests. *“A vocational assessment of a worker by a psychologist to identify potential and alternative career employment options carried out by means of integrated clinical and standardised assessment procedures and instruments.”* (Psychology Fee Schedule and Guidelines 2013 – 2014, p. 17.) Due to the adherence of defining this service as requiring use of *“standardised assessment procedures and instruments”*, this service was restricted to Psychologists only.

Unfortunately, we note that the *Return to Work Schedule* (pp, 43, 44 and 54) now specifies 3 different categories of provider as being able to provide this service:

1. A Class A Return to Work Consultant who is a registered Psychologist
2. A Class A Return to Work Consultant who is a Rehabilitation Consultant
3. A Class B Return to Work Consultant who meets the HCWA minimum qualification requirements, have the relevant professional recognition/registration/accreditation and who do not meet the criteria for Class as RTW Consultants

Are we to take this to mean that the WorkCover Corporation has now redefined the nature of a Vocational Assessment? If the Vocational Assessment is no longer based on the conduct, interpretation and reporting of results based on sound psychometric testing, how is this service different from the Suitable Employment service?

We take this opportunity to reiterate our significant concerns about the Corporation promoting a service relying on non-validated assessment measures for injured workers who may have complex presentations. We acknowledge that for some injured workers there may be a place for



a Suitable Employment assessment, however for other more complex situations (e.g., a head injured worker) or where decisions must be based on an understanding of the interplay between cognitive abilities, personality factors and interests and how these relate to projected work roles, we suggest that testing should be conducted by psychologists using validated psychometric measures only. To do otherwise, will be overly simplistic, indefensible and costly to both the injured workers subject to such practices and ultimately to the workers compensation scheme.

We also note that the specification of 3 different categories of RTW Consultants being able to provide the Vocational Assessment service stands in direct contradiction to the information provided on Slide 49 of the *New Return to Work Services Fee Schedule: Provider Information Session* delivered on 12 March, 2014 by Ms Marcia Vernon. That Slide cited that only Psychologists who met the criteria to be a Class A RTW Consultant were considered to be suitably qualified and experienced to provide Vocational Assessments.

We therefore respectfully request clarification from the WorkCover Corporation, as a matter of urgency, regarding how the Vocational Assessment service is being defined and whether or not Psychologists are considered to be the sole providers of the service.

Clearly, our profession believes very strongly that a Vocational Assessment should only be provided Psychologists and that a hallmark of an acceptable Vocational Assessment should be that the recommendations should be based on information derived from “*integrated clinical and standardised assessment procedures and instruments.*” (*Psychology Fee Schedule and Guidelines 2013 – 2014*, p. 17.). If this is the case, we assert that the service should attract the same fee as all other psychology services. The IPPP and APS have a strong preference that the Vocational Assessment service should be retained in the *Psychology Fee Schedule*, as we consider that all services provided by a psychologist to injured workers and which are funded by the workers compensation scheme, should in some way be contributing to the goal of a successful return to work. Nonetheless, should the WorkCover Corporation wish to place the service within the Return to Work Services Schedule, and should the Corporation have made an error in the Schedule in citing that providers other than Psychologists are appropriate to provide this service, we are adamantly opposed to degrading the training and expertise of Psychologists who conduct Vocational Assessments by allowing them to be paid a lesser rate than Psychologists providing other services within the workers compensation arena. For many years we have argued that the maximum hours that can be charged for a Vocational Assessment are inadequate if a comprehensive Assessment is to be provided. Not only has this opinion been ignored, the hourly rate has now been reduced. A Psychologist who provides a Vocational Assessment is to be paid \$166.20 per hour, while all other psychological service provision is to be paid at \$170.20. Where is the rationale for this? We again respectfully request that the WorkCover Corporation provide its objective reasoning for classifying this psychological service as being worth less than other services provided by Psychologists.

In addition, we also suggest it is advisable that Psychologists should be able to provide this valuable service from an objective professional stance, in preference to being tied to a Return to Work or Job Placement service provider organisation. Unless Psychologists run such provider organisations, are employed by one or develop a contracting relationship to them, individual practitioners will no longer be able to provide Vocational Assessments. We question whether



this is a wise move in terms of promoting the provision of objective assessments and unbiased advice within the workers compensation system.

In closing this correspondence, the IPPP and APS state that we have worked diligently and cooperatively with the WorkCover Corporation for some years now. We are dismayed by what appears to have been some deliberate exclusion of the profession and our concerns within this most recent round of fee and service negotiations. We were not originally provided with the draft *Return to Work Services Fee Schedule* and were only given it when we perhaps somewhat naively questioned whether the Vocational Assessment service had inadvertently been left out of the draft *Psychology Fee Schedule*. At that time, we were advised that the Vocational Assessment service had been retained but had just been moved to the *Return to Work Services Fee Schedule*. Again, perhaps naively, we believed what we were told, only to find no mention of the Vocational Assessment service in the draft *Return to Work Services Fee Schedule* when we eventually received a copy. As stated at the commencement of this document, we provided clear feedback to the WorkCover Corporation regarding why the Vocational Assessment service should be reinstated and we are pleased that our advice was noted. However, we are also dismayed that Slide 7 of the *New Return to Work Services Fee Schedule: Provider Information Session* makes no mention that consultation occurred with the psychology profession through the IPPP and APS or that feedback was received from us. The IPPP and APS have been explicit in stating that if there are problems with specific providers or if the standards of service provided by the profession are not meeting the Corporation's expectations that we are happy to work cooperatively to seek positive change. We wish to continue to build a solid working relationship between the psychology profession and the WorkCover Corporation and we hope that these recent problems can be addressed.

We look forward to being invited to a meeting to discuss these concerns in the very near future.

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Yours sincerely

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