

9 April 2020

Calling for Clarity – Essential Healthcare

Provide equal access to trusted health practitioners to reduce medical and hospital burden.

We call on the ACT government to clarify its definition of permitted healthcare providers.

We know that **healthcare providers help ease the pressure on our hospital system and medical practitioners**. This is particularly important at this crucial time.

In fact, on 26th March 2020, the Commonwealth Principal Medical Advisor advised a broad range of allied health professions “government encourages healthcare workers to continue working, to help ease the pressure on our hospital system.”¹

What is ACT’s Current Approach?

The ACT’s current approach to “essential healthcare services” is simple. It prohibits “beauty and personal care service spas and massage parlours”.

Unfortunately, there is widespread confusion around Australia within the healthcare sector. This is because different States and Territories have adopted various interpretations of “essential healthcare services”. Indeed, different agencies in the same State (eg health and police) seem to be applying distinct interpretations of the directions in that State. In some cases, we are receiving contradictory advice on what healthcare services are permitted from within the same department in the one State.

This has resulted in healthcare providers around Australia feeling anxious about whether they can continue to treat patients. Some providers have pre-emptively closed their businesses, to avoid issues with the police. Other providers want to continue to treat their patients’ healthcare issues.

Canberrans rely on their healthcare providers to help them ease the burden of chronic conditions and pain. But with the latest directives around the country, numerous healthcare providers don’t know if they are required to cease practice.

¹ “where you don’t need a face-to-face consultation, government encourages audiovisual consultations.”

Just last week, Victoria reversed its position on allied health and expanded its list of permitted allied healthcare providers to myotherapy, therapeutic and remedial massage, and other allied health providers.

Background

On 24 March 2020, the Prime Minister announced the prohibition of all beauty and personal care service spas and massage parlours.

On 31 March 2020, the ACT Chief Health Officer issued a Notifiable Instrument that mirrored the PM's announcement

The responses of all Australian State and Territory governments are summarised at Attachment 1.

How does Uncertainty Hurt Small Business Healthcare Providers?

Right now, around Australia, many healthcare providers want to play their role helping our country through the Covid-19 pandemic. Healthcare providers can help reduce demand on overburdened hospitals and medical services.

However, unclear directions are confusing healthcare providers. This is resulting in healthcare providers shutting their doors and turning away patients, rather than risk police fining their patients and practices.

Uncertainty hurts small business health providers. For example:

- healthcare providers are not insured if they practice contrary to a government direction;
- closed small and micro-business healthcare providers and their employees are without income;
- small and micro-business operators and employees who close their businesses to be "on the safe side" struggle to access Covid assistance without a formal government announcement that specifically mentions their industry/ies;
- we are receiving distraught phone calls from members, who simply don't understand why government advice is so confusing; and
- patients with chronic healthcare issues who have built a relationship of trust and understanding with their preferred healthcare provider over long periods of time suddenly do not know where to turn for appropriate assistance during a national healthcare crisis.

About Myotherapy Association Australia

The Myotherapy Association Australia (MA) is Australia's only association dedicated solely to the needs of myotherapists and the myotherapy profession. MA is committed to the highest standards of corporate governance and furthering the interests of myotherapists through programs that support, promote, develop, and endorse the myotherapy profession and maintain the highest standards of practice for our members and their clients.

Why Health Practitioner Regulation is not the most Appropriate Definition of Permitted Healthcare Services

Queensland and Tasmania specifically reference the Health Practitioner Regulation National Law in their Directives.

However, the Health Practitioner Regulation National Law only registers a very small number of listed healthcare professions. It does not include many trusted and well-respected healthcare professions, such as: social work, exercise physiologists, speech pathologists, myotherapists, audiologists, dieticians, orthoptists, orthotists, prosthetists, and remedial massage therapists.

What should be Permitted Healthcare Services?

Around Australia, State and Territory governments have listed non-essential services. They all include “personal care massage”. Many jurisdictions have specifically permitted remedial massage and other allied healthcare services, such as myotherapy.

Another approach, which we understand was originally proposed by the Queensland government, would be to allow Medibank-registered healthcare providers to continue practicing. Essentially, healthcare providers who meet strict criteria can apply to the private health insurers (PHIs) for a provider number. This allows payment of PHI rebates for services performed by that individual provider in a particular location (a separate provider number is provided for each location). Most PHIs follow Medibank in determining who is eligible for a provider number. PHIs have robust fraud detection mechanisms, including de-registering, and referring for prosecution, fraudulent providers.

I have attached an updated table that compares all Australian jurisdictions’ treatment of myotherapy.

I urge you to either:

- adopt Queensland’s original proposal to permit Medibank-registered (PHI-registered) healthcare providers to continue practicing; or
- clarify that myotherapists are permitted to continue practicing in the ACT.

I am keen to discuss with you further how myotherapy fits into the ACT’s health and medical services, so that we can together work on a fit-for-purpose definition that helps achieve government’s goals of reducing unnecessary hospitalisations, where healthcare providers, such as myotherapists, can help patients better manage their health.

Please do not hesitate to contact me on 0410 724 655 if you have any queries.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anna Yerondais', with a long horizontal flourish extending to the right.

Anna Yerondais

Chief Executive Officer

Myotherapy Association Australia

Attachments:

1. **Australian Government Interpretations of Non-Essential Healthcare**
2. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
3. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
4. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
5. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
6. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
7. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue – [name withheld]**
8. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
9. **Letter of Support for Soft Tissue Therapy (Similar to Myotherapy) to Continue in the ACT – [name withheld]**
10. **Letter of Support for Myotherapy to Continue – [name withheld]**
11. **Letter of Support for Myotherapy to Continue – [name withheld]**
12. **Letter of Support for Myotherapy to Continue – [name withheld]**
13. **Letter of Support for Myotherapy to Continue – [name withheld]**
14. **Letter of Support for Myotherapy to Continue – [name withheld]**
15. **Letter of Support for Myotherapy to Continue – [name withheld]**
16. **Letter of Support for Myotherapy to Continue – [name withheld]**
17. **Letter of Support for Myotherapy to Continue - [name withheld]**
18. **Letter of Support for Myotherapy to Continue – [name withheld]**
19. **Letter of Support for Myotherapy to Continue – [name withheld]**