

8 April 2020

Calling for Clarity – Essential Healthcare

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

We call on the Tasmanian government to align itself with other jurisdictions in Australia and expand its definition of permitted healthcare providers to include myotherapy.

We know that **healthcare providers help ease the pressure on our hospital system and overburdened 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 Tasmania’s Current Approach?

Tasmania’s current approach to “essential healthcare services” is complex and confusing. Late last week, we received assurances from the Department of Premier and Cabinet, via the Tasmanian hotline, that ONLY listed services were prohibited in Tasmania, and therefore myotherapy was permitted. We were specifically informed that there were too many permitted healthcare professions to list.

However, on the 3rd of April, Tasmania issued a new directive, which listed, as permitted:

- a registered health practitioner within the meaning of the Health Practitioner Regulation National Law (Tasmania); or
- a person who holds accreditation, as an accredited exercise physiologist, with Exercise and Sports Science Australia Ltd.

Unfortunately, this new directive has resulted in confusion for healthcare providers who don’t fall in these two categories. Quite rightly, they want to know why the directive specifies a small number of healthcare professions and omits the others.

Telephone conversations with the Tasmanian government affirm that remedial and therapeutic massage for disabled patients are still permitted.

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

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

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. We urge Tasmania to follow suit.

Background

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

On 3 April 2020, the Tasmania Director of Public Health issued a Direction under section 16, which prohibits relevantly:

12. All spas and massage parlours and other similar premises.

13. All indoor and outdoor swimming pools, gymnasiums, health clubs, fitness centres, wellness centres (including yoga and barre premises), indoor venues used for sport or fitness, saunas, bath houses and other similar premises or venues, other than such part of the premises or venue used to provide physical rehabilitation services if –

(a) the rehabilitation services are provided by, or under the direction of –

(i) a registered health practitioner within the meaning of the Health Practitioner Regulation National Law (Tasmania); or

(ii) a person who holds accreditation, as an accredited exercise physiologist, with Exercise and Sports Science Australia Ltd (ABN 14 053 849 460); and

(b) each person in that part of the premises complies with the requirements of paragraphs (g) and (h).

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

What are the Results of Tasmania's Latest Direction?

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, rather than risk police fining their patients and practices.

Unfortunately, the Tasmanian Direction has only added to the confusion among healthcare providers:

- the specific reference to the Health Practitioner Regulation National Law and exercise physiologists has healthcare providers asking if ONLY those professions are permitted to practice;
- creating an even more fragmented approach to healthcare across Australia, where people in one State can access appropriate healthcare treatments prohibited to people in their neighbouring State;

- healthcare practitioners are not insured if they practice contrary to a government direction – given the clear listing of some professions in your Direction, other healthcare practitioners are asking if they are permitted to practice;
- it creates a disadvantage for the health outcomes of Tasmanians –with access to trusted healthcare providers limited while they work out whether they are permitted to practice;
- a number of small and micro-businesses and their employees are without income;
- Tasmanian small and micro-business operators and employees who close their businesses to be “on the safe side” of your Direction 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 why one day they can treat patients and the next day they cannot treat patients, when other parts of Australia can continue to practice; 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 - let us hope that this does not result in unnecessary hospitalisations.

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

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: exercise physiologists, speech pathologists, myotherapists, audiologists, dieticians, orthoptists, orthotists, prosthetists, and remedial massage therapists.

You have specifically permitted exercise physiologists, but not other healthcare professions outside the scope of the Law.

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 proposal to permit Medibank-registered (PHI-registered) healthcare providers to continue practicing; or
- clarify that myotherapists are permitted to continue practicing in Tasmania.

I am keen to discuss with you further how myotherapy fits into Tasmania'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,



Anna Yerondais

Chief Executive Officer
Myotherapy Association Australia

Attachments:

1. **Australian Government Interpretations of Non-Essential Healthcare**
2. **Letter of Support for Myotherapy to Continue – [name withheld]**
3. **Letter of Support for Myotherapy to Continue – [name withheld]**
4. **Letter of Support for Myotherapy to Continue – [name withheld]**
5. **Letter of Support for Myotherapy to Continue – [name withheld]**
6. **Letter of Support for Myotherapy to Continue – [name withheld]**
7. **Letter of Support for Myotherapy to Continue – [name withheld]**
8. **Letter of Support for Myotherapy to Continue – [name withheld]**
9. **Letter of Support for Myotherapy to Continue – [name withheld]**
10. **Letter of Support for Myotherapy to Continue – [name withheld]**
11. **Letter of Support for Myotherapy to Continue – [name withheld]**