

From: [Tonie Gilbert](#)
To: [Non Treat Practitioners](#)
Subject: AHP and IMC
Date: Wednesday, 6 March 2019 12:16:05 PM

Dear Ms Collins,

Thank you for providing me with the opportunity to comment on the proposal for a new SIRA framework. I have had a brief look through the proposed changes and they seem to me to be positive in terms of making the process more transparent and user friendly as well as reducing administrative costs. However, that is not the purpose of my email.

With respect to the AHP and IMC roles under the new system I have a question/proposal.

I was appointed by SIRA as a health practitioner authorised to provide medico-legal reports and Dispute Resolution Services under the CTP scheme on 22 June 2018. Since then I have been approached on a number of occasions by staff at QBE and EML to provide IMC services to their case managers on complex psychological worker's claims. I have indicated to them that I cannot undertake IMC services because I do not meet the criteria. That is, I am not a Medical Practitioner and I have not been appointed to the SIRA IMC panel, nor can I be, under the current system.

My question is, under the new SIRA framework, which includes the CTP scheme, is it possible to expand the criteria of the IMC role from only "*medical practitioners*" to include Allied Health Practitioners authorised to provide medico-legal reports and DSR services under the current CTP scheme?

Of course IMC services would need to be confined to the area of expertise, for example with Psychologists it would be for Psychological injury claims only. I believe that psychologists have a particular level of expertise in the management of psychological injuries and can add significant value to the current system.

For the past 20 years I have worked in the field of Workplace rehabilitation as a Rehabilitation Case Manager in both the Workcover and Comcare systems. During that same period I have also work in the Independent Medical Examinations field. I have been asked on several occasions to provide training on IMC interviewing and report writing with respect to psychological injuries, by the Australian Medicolegal College. For this reason I believe there is a role for psychologists in the IMC framework using their knowledge and expertise to reduce the overall costs of psychological injury claims.

I thank you for your time and look forward to your reply.

Yours faithfully

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