

Submission to the Senate Standing Committees on Community Affairs, Inquiry into Commonwealth Funding and Administration of Mental Health Services

We refer to the Terms of Reference of this inquiry into the Government's funding and administration of mental health services in Australia. This submission relates in particular to the following components of the terms of reference:

Changes to the Better Access Initiative, including:

- (i) the rationalisation of general practitioner (GP) mental health services,*
- (ii) the rationalisation of allied health treatment sessions,*
- (iii) the impact of changes to the Medicare rebates and the two-tiered rebate structure for clinical assessment and preparation of a care plan by GPs, and*
- (iv) the impact of changes to the number of allied mental health treatment services for patients with mild or moderate mental illness under the Medicare Benefits Schedule*

Services available for people with severe mental illness and the coordination of those services

Mental health workforce issues, including:

- (i) the two-tiered Medicare rebate system for psychologists,*
- (ii) workforce qualifications and training of psychologists*

Background

Embracing the Other Half psychology clinic (ETOH) is a **private, specialist tertiary referral clinic**, based in Pymble NSW. Our areas of specialisation cover developmental disorders such as Autism Spectrum Disorders (including Asperger's Syndrome), Attention Deficit Disorder, Attention Deficit Hyperactivity Disorder, Tourette Syndrome and other complex presentations. We work with individuals, couples and families across the life-span. Our objective is to provide the **highest and most advanced level of evidence based mental health care**.

The vast majority of our clients are referred by psychiatrists, paediatricians, GPs, psychologists, speech pathologists, occupational therapists and other allied healthcare professionals, reflecting the complex and often intractable nature of their disorders. A very high proportion of our clients experience multiple co-morbidities adding to complexity of their conditions and treatment needs. **In general, we are referred clients with more severe mental illnesses that other medical professionals are unable to treat effectively.**

ETOH was founded 7 years ago and is currently run by two Clinic Directors – Dr Julie Peterson and Steven Den-Kaat – both of whom are APHRA Clinical Psychologists and specialist providers under Medicare. In addition, the Clinic contracts and employs multiple Clinical Psychologists who are progressing to specialist standing, Intern Psychologists and research staff. Ongoing training and development of the capabilities of our team and the acquisition of resources to assist our clients is a key objective of the Clinic.

Comments on Items under the Terms of Reference of the Inquiry

Given ETOH's specialisation in the most complex psychological cases, which have not been successfully addressed by other mental health providers, we are extremely concerned at the proposed removal of the specialist Medicare designation and associated two-tier rebate structure. These concerns arise for a number of reasons:

- a) Removal of the specialist categorisation will mean that individuals and medical practitioners may be **less able to differentiate** between those who truly have

specialist knowledge and capabilities in an area, and those who may claim to have such capabilities, but do not. With all due respect to our medical and registered and clinical psychologist peers, it is very clear from our daily interaction with clients that very few medical professionals have the requisite knowledge and capabilities to provide effective treatment in our areas of specialisation, even though possessing medical, specialist medical (e.g., psychiatric), or psychological training.

- b) The provision of the highest levels of mental health treatment requires **extraordinary levels of training and experience**. As an example, the Clinic Founder, Dr Julie Peterson has a Doctorate in Clinical Psychology, has completed multiple diplomas/degrees and regularly travels both interstate and internationally for professional development. (To the extent that her professional development time consistently exceeds that required by APHRA and the Australian Psychology Society by a factor of 10!) The commitment to this level of training would not be feasible under the lower fee structure that would be required without the specialist Medicare rebate.
- c) The provision of true specialist psychological services also requires **significant physical resources** that, again, would not be achievable under a single tier fee structure. For example, the ETOH clinic has purchased a wide range of psychometric tests and resources at a cost of approximately one hundred thousand dollars. These resources are crucial to the provision of evidence based mental health services and can only be afforded under a higher fee structure made possible by the tiered Medicare rebate structure.
- d) The efficacy and **cost effectiveness of the provision of specialist health services is high**. This is recognised in the specialist structure that applies in other areas of medical health provision. As a tertiary referral clinic we deal with clients that typically cannot be effectively helped by other providers. If the specialist rebate were to be abolished then many clients would **no longer be able to access** this service, with a corresponding significant increase in the health burden on agencies and providers who are ill equipped to provide these services. This would simultaneously increase the cost of the provision of mental health services while decreasing the effectiveness of the treatment provided.
- e) As noted above, the provision of effective specialist psychological treatments requires the acquisition and maintenance of very high levels of skills and experience. The removal of the specialist Medicare fee differential would **significantly reduce the incentive** for capable psychologists to develop their skills to the levels required to provide specialist level treatment to Australians with mental health needs.

The provision of specialist psychological treatments under the Medicare Rebate System was a significant step forward in the provision of effective mental health services in Australia. While we believe that the aspects of the proposed changes to the administration and funding of mental health services which would broaden the availability of mental health services are to be commended, we also believe that the abolition of the existing effective specialist structure would reduce the overall efficacy of the delivery of mental health services in Australia.

Yours Sincerely

Dr Julie Peterson
Clinic Director and Founder

Steven Den-Kaat
Clinic Director