



**AUSTRALIAN MEDICAL ASSOCIATION
(SOUTH AUSTRALIA) INC.**

ABN 91 028 693 268

12 July 2021

Mr Rob Lucas MLC
Minister for Industrial Relations
GPO Box 2264
ADELAIDE SA 5000

Email: Treasurer.dtf@sa.gov.au

Dear Minister

Re: AMA(SA) response to the ReturntoWorkSA revised Impairment Assessment Guidelines

On behalf of the Australian Medical Association South Australia (AMA(SA)) Council and our members, I am contacting you to convey our concerns about the draft ReturntoWorkSA (RTWSA) Impairment Assessment Guidelines.

In preparing a response to the draft Guidelines, AMA(SA) CEO Dr Samantha Mead and I met and corresponded with members of the AMA(SA) ReturntoWorkSA Reference Group, who work in the workers' compensation field and are best placed to understand how existing and future guidelines do and should work in practice. Feedback from this group was instrumental in formulating our considered response.

However, it was very clear during this process that the Reference Group members were perplexed at how the Guidelines had been developed, and by whom. They were not aware that any of the main parties involved in the assessments had expressed serious concerns with the existing Guidelines; nor were they aware of any invitations addressed to themselves or their colleagues to review or change the existing Guidelines.

In addition, the members were extremely concerned that, having been presented with the 129-page draft Guidelines, AMA(SA) had been asked to respond in an appropriate manner within four weeks. (In fact, the period was reduced to two weeks, as Dr Mead and I decided it was imperative that we attend a RTWSA information session before we developed our response.) As they pointed out, many of the draft Guidelines related to changes to protocols and clinical decision-making that must necessitate, as only one of the many steps involved, a level of consultation between and among Faculty and College colleagues that is impossible to arrange in such a short period.

In light of this feedback, in addition to the nature of the comments the Reference Group members made about specific elements of the draft Guidelines, I committed to contacting you about our concerns, and signified this intention in our response to RTWSA of 24 June 2021 (attached). In the interim, I note that you have indicated in a media article about the Guidelines and the consultation process (*InDaily*, 8 July 2021), that you will consider advice from the Minister's Advisory Committee. I will be sharing our members' concerns with this group, which, as you are aware, does include AMA(SA) representation.

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In the meantime, I ask that you suspend further action in relation to these draft Guidelines, and – if and when changes are subsequently deemed to be necessary – begin a review process that starts with and maintains input from the medical, legal and other professionals involved.

Please contact me if you wish to discuss this further, by contacting me through AMA(SA) Executive Assistant Mrs Claudia Baccanello on 8361 0109 or at claudia@amasa.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to be 'MA', with a long horizontal stroke extending to the right.

Dr Michelle Atchison
BM, BS, FRANZCP, GDipArtHist, AMA(M)
President

Cc Mr Michael Francis, CEO, ReturnToWorkSA