

5 September 2023

[REDACTED]
[REDACTED]
State Insurance Regulatory Authority

Dear [REDACTED]

Re: icare's feedback on the Model of Care for the management of low back pain

1. Insurance and Care NSW (**icare**) thanks the State Insurance Regulatory Authority (**SIRA**) for the letter dated 16 August 2023, acknowledging icare's feedback on the draft Frequently Asked Questions (**FAQ**) for insurers and advising of the public consultation of the implementation of the Model of Care (**model**) across NSW personal injury schemes.
2. Firstly, icare acknowledges and thanks SIRA for taking into consideration its feedback on the draft FAQ for insurers and removing references to insurers and Claims Service Providers being responsible for ensuring treatment providers deliver care in line with the model. icare appreciates SIRA's responsiveness to its feedback and looks forward to further supporting and assisting SIRA with the implementation of the model. Accordingly, icare would appreciate if SIRA could provide its amended FAQ for insurers.
3. icare continues to support promoting evidence-based care of low back pain and discouraging approaches with proven poor outcomes to promote optimal health outcomes in the Workers Compensation (**WC**) and compulsory third party (**CTP**) schemes.
4. icare provided its feedback on the implementation of the model in its previous submission to the FAQs for insurers in detail, **Appendix A** to this letter, including barriers and considerations to implementation such as:
 - Consideration of legislative test 'reasonably necessary' in the WC scheme and 'reasonable and necessary' in the CTP scheme. icare is concerned about the implementation of the model as the WC and CTP schemes are required to assess treatment in accordance with the legislation, as is the Personal Injury Commission in the event of a dispute.
 - Piloting the model prior to implementing scheme wide. icare recommends SIRA consider piloting the model with health practitioner groups as a test and learn approach and to apply any learnings in operationalisation of the model to the wider schemes.
 - Clarifying musculoskeletal speciality and consulting with tertiary referral hospitals and specialist care prior to implementation. This will ensure expectations and resourcing is in place to meet potential demand without delays to injured persons.
 - Educating, training, consultation and further change management practises for all stakeholders to ensure stakeholders adopt the model.
 - A clear implementation timeline for the model.

5. icare would welcome the opportunity to discuss this feedback further and to work collaboratively with the SIRA. If you have any questions or would like to discuss further, please do not hesitate to contact me at

[REDACTED]

Yours sincerely,

[REDACTED]

[REDACTED]