

Western Australian Voluntary Assisted Dying

Practitioner fee for service payment guidelines

January 2025

Disclaimer These guidelines have been developed to support fee for service payments to Voluntary Assisted Dying Practitioners. These guidelines should not be taken as constituting professional advice. You should consider seeking independent financial, or other professional advice based on the content of these guidelines.

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Introduction

Voluntary assisted dying (VAD) in Western Australia (WA) is regulated by the *Voluntary Assisted Dying* Act 2019 (the VAD Act).

Currently, VAD services cannot be claimed under the Medicare Benefits Schedule (MBS), leaving much of the work undertaken by practitioners as unpaid unless privately billed. Inadequate remuneration for practitioners is considered a barrier to provision of VAD services.

The VAD practitioner fee for service payment guidelines (the guidelines) have been developed to advance equity of access to VAD services. The guidelines aim to support practitioner participation in the VAD process through payment of a fee for service for specific VAD services provided to the patient.

1.1. **Principles**

The principles underpinning these guidelines are:

- equitable access to VAD services for all Western Australians, regardless of their financial capacity, location of residence and other social determinates of health
- VAD practitioners being remunerated for services provided under the VAD Act
- patients not being required to pay VAD practitioners for access to VAD services
- a person-centred approach which supports choice
- a sustainable workforce where VAD practitioners are recognised and remunerated for their work
- safe and accessible VAD services to patients, through a growing pool of practitioners, reducing the risk of practitioner burn out and attrition.

2. Overview of fee for service process

Step 1

Consent and provision of VAD services

- · Practitioner:
 - gives consent to use information
 - provides VAD services
 - · submits forms to the VAD Board.

Step 2

Receives the estimate

- practitioner receives email correspondence outlining the estimated fees which can be claimed, and a unique claim number
- estimate is calculated based on services provided in the prior month, as per VAD-IMS.

Step 3

Lodge service fee claim

- Practitioner:
 - · submits invoice for VAD services rendered
 - · receives payment.

Figure 1. Overview of how VAD practitioners can lodge a service fee claim.

2.1 Lodging notice of service

Practitioners are required to provide written consent to allow the End of Life Care Program (EOLCP) team to access specific deidentified patient information, as submitted by them, in VAD-IMS. This consent allows the Department of Health (department) to use this data to estimate the fee payable to the practitioner.

Notifying the VAD Board of provision of VAD services is a mandatory requirement under the VAD Act. This is done by the submission of forms, which are uploaded to VAD-IMS.

For the purpose of the guidelines, form submission will be considered the 'notice of service', which determines the amount payable to the practitioner. The practitioner is responsible for ensuring the information submitted is true and correct.

Eligible services include:

- First assessment
- Consulting assessment
- Final review (including a one-off miscellaneous payment)
- Administration decision and prescription
- Practitioner administration.

The estimate will be based on VAD-IMS forms submitted in the prior month (for example, the estimates raised in August 2024 will cover forms lodged in July 2024). It is the practitioner's responsibility to ensure that all forms are submitted each calendar month. Late submissions of forms will result in delay in payment.

The department will assess the notice of service for:

- practitioner consent to use of information in VAD-IMS for payment purposes
- only VAD-IMS forms that relate to the key stages in Figure 2 below will be used in the estimate.

2.2 Lodging a service fee claim

2.2.1 **Eligibility**

For fees to be claimed, the practitioner must ensure the service meets all the following conditions:

- the service provision must be compliant with the VAD Act
- the services provided must be covered by professional indemnity insurance
- the practitioner must not have provided the services in their capacity as an employee of a Health Service Provider (HSP)
- the practitioner must not have provided the services as part of any other paid arrangement with the department or another government agency (Note: The Regional Access Support Scheme (RASS) can continue to be used when appropriate).

The department may withhold payment if there are reasonable grounds to believe that a VAD practitioner has materially or intentionally breached the above conditions, or their claim is materially or intentionally false.

2.2.2 **Claims**

The practitioner must include a tax invoice as part of the claim and complete the declaration in RedCap. Both must be lodged within 6 months of the estimate being raised and the invoice must be submitted to EOLC.AP@health.wa.gov.au

All of the following conditions apply:

- the claim must not include any patient personal details
- the tax invoice must include:
 - invoice number (this must be unique)
 - business name and address
 - ABN
 - date
 - bank account details for payment
 - the claim reference number (CRN) unique to each estimate
 - a brief description (e.g. general services)
 - addressed to:

Department of Health

End of Life Care Program

May Holman Building, 189 Royal Street, East Perth WA 6004

ABN: 28 684 750 332

(08) 9222 4222

EOLCP.AP@health.wa.gov.au

- if the claim covers multiple months, the value being claimed per claim number must be detailed (refer Appendix 1 for an example)
- where GST applies, the practitioner must comply with the *A New Tax System (Goods and Services* Tax) Act 1999 (Cth).

The service fee claim and invoice do not need to indicate provision of VAD services. An example of a valid invoice is provided at Appendix 1.

3. How the estimate is calculated

3.1 Fees payable for VAD services

The following are fees payable as of 1 July 2024, excluding goods and services tax (GST).

Fees are not accompanied by further benefits or on-costs, for example, employment benefits, the right to ongoing payments, indemnity insurance, etc.

VAD-IMS forms triggering the fee for service payment					
First assessment (S29)	\$478.50				
Consulting assessment (S40)	\$287.10				
Final review (S51)	\$191.40				
Administration decision and prescription (S60)	\$287.10				
Practitioner administration of prescribed substance (S61)	\$765.60				
*Miscellaneous payment (S51)	\$191.40				

Figure 2. Current fee rates for VAD services, noting the section of the Act the notice of service relates to.

Please note:

- these guidelines apply to VAD services rendered after 30 June 2024
- the*miscellaneous payment is a one-off payment that is automatically made with the final review. This reimbursement is in lieu of additional services such as coordinating family support, engagement with statewide services and grief and bereavement support
- travel is not covered under service payments, but practitioners can claim travel expenses to regional areas through the RASS when appropriate
- Health Support Services will provide payment within 20 calendar days of the date of the invoice.

3.2 Requesting further information for the estimate

Practitioner queries can be emailed to <u>EOLCP.AP@health.wa.gov.au</u> quoting the claim number.

Where the query relates to the accuracy of data within VAD-IMS, the matter will be referred to the VAD Board Secretariat Unit.

Confidentiality

4.1 **Protecting patient data**

VAD practitioners are strongly advised **not to identify patients** during communication, or otherwise transmit patient personal information.

No patient data is to form a part of the service fee claim.

Each notice of service lodged in VAD-IMS generates a unique form ID which is included in the estimate for ease of reference.

4.2 **Protecting practitioner data**

The estimate issued by the department, and related correspondence, will only be sent to the practitioner's registered email address in VAD-IMS. The email address must be kept up to date.

To facilitate communication, a unique claim number will be issued to the practitioner in the estimate. This unique claim number will not identify practitioners and is specific to each estimate.

5. Review

The guidelines will be reviewed on an annual basis. This will be coordinated by the EOLCP team and will include any changes to related legislation, policy and best practice.

6. Definitions

For the purposes of these guidelines, the following definitions apply.

claim	reference
numb	er

A unique number issued to the practitioner during a payment period by the

department.

fee for service

A payment available to VAD practitioners under the guidelines.

MBS

Medical Benefits Scheme

medical practitioner

A person registered under the *Health Practitioner Regulation National Law* (Western Australia) in the medical profession (other than a student).

notices of service

Notification to the VAD Board of a VAD service being provided pursuant to S29 (first assessment), S40 (consulting assessment), S51 (final review), S60 (administration decision and prescription), S61 (practitioner substance administration) of the Act, on the proviso that notification, timing and manner of submission to the VAD Board is compliant with the Act and related policies.

nurse practitioner

A person registered under the *Health Practitioner Regulation National Law* (Western Australia) in the nursing profession whose registration under that Law is endorsed as a nurse.

registered email

The email address nominated by the VAD practitioner at time of registering for WA VAD approved training, or as updated in VAD-IMS thereafter.

service fee claim

Submission of an invoice for VAD services rendered, and any further information required in accordance with these guidelines.

service notice claim number

A reference number issued when a notice of service is lodged in VAD-IMS. This is also known as the form ID.

VAD Board

The statutory board established to ensure compliance with the Act and to recommend safety and quality improvements relating to voluntary assisted dying.

VAD-IMS

Voluntary Assisted Dying Information Management System. The online platform for management of VAD in Western Australia. It is where practitioners can:

- submit forms to the VAD Board
- register for the WA VAD Approved Training.

VAD practitioner

A medical or nurse practitioner who has successfully completed the WA VAD Approved Training

VAD services

Providing a patient with VAD specific end of life healthcare, as prescribed under the Act.

Appendix 1: Example of a valid invoice

Name:								
Position: (e.g. medical/nurse practitioner)								
ABN: (if applicable)								
Business name: (if applicable)								
Address:	Invoice number:							
Mobile number:	Invoice date:							
Email:								
TAX INVOI	CE							
Email: EOLCP.AP@health.wa.gov.au Health Networks Department of Health 189 Royal Street, East Perth, WA 6004 Postal address: Perth Business Centre, PO Box 8172, Perth WA 6849 ABN: 28 684 750 332								
Description	Quantity	Unit price	Amount					
General EOLC services You must include the related CRN (e.g. 202501-316)								
Dates								
Fees			\$765.60					
GST (if applicable)								
Total (inc. GST)								
Payment can be forwarded to: Account name:								
Bank:								
BSB number:								
Account number:								
For billing enquiries contact:								
Phone:								



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