



The Hon Greg Hunt
Minister for Health & Aged Care

By email Minister.Hunt@health.gov.au

15 September 2021

Engagement of allied health in COVID-19 rapid antigen testing

Dear Minister Hunt

As you are aware, allied health professionals around Australia are actively involved in combating the spread of COVID-19, including most recently through administering vaccinations.

As specialist, regulated health care workers trained in the use of PPE and infection control, our members continue to seek to use their skills and experience to their full scope during the pandemic.

We are therefore concerned that allied health professions are being underutilised in the administration of rapid antigen tests. As you are aware, such tests must be administered by a health practitioner, medical practitioner or paramedic, or a person under the overall supervision of these personnel.

Section 3(1) of the *Therapeutic Goods Act 1989* lists occupational therapy, optometry, physiotherapy, podiatry and psychology under the definition of 'health practitioner'. However, the allied health sector has expanded considerably in scope over the 30 years since the Act commenced. For example, exercise physiologists, osteopaths, audiologists, speech therapists and medical radiation practitioners are not included in the legislative definition.

Particularly while concerns remain about the accuracy of home testing antigen kits, an expedited amendment to the definition of 'health practitioner' would boost the professional testing workforce.

We welcome a discussion of this matter with you.

Kind regards

A handwritten signature in black ink, appearing to read "Claire Hewat", written in a cursive style.

Claire Hewat
Chief Executive Officer