

From: Sue Gasquoine

Sent 13/12/2019 08:41

To: ACregs

Date:

Received 13/12/2019 08:45

Date:

CC:

BCC:

Subject: re: Consultation on ACC regulated payments for treatment.

Kia ora koutou,

Below is the New Zealand Nurses Organisations (NZNO) response to the Cost of treatment proposals from ACC.

Q1 Do you have a view on the proposed 1.72 percent and 2.05 percent increases to the payments listed in Table 1 below? Please provide reasons for your view. (2.05% covers GPs, Nurses, NPs and specialists, 1.72 covers radiologists, OTs and a number of other professions)

NZNO Response:

NZNO Members disagree with the proposed increase as it is inadequate.

The largest single cost in primary care is labour – because it operates from a low overhead and in a relatively low technology model. Labour is about 80% of the cost of providing primary care and a significant part of that labour is provided by nurses.

Underfunding of the primary care workforce is particularly felt in general practice where the flow on effects of MECAs for DHB staff such as nurses results in workforce challenges particularly recruitment and retention. 2.05% increase would result in further underfunding of the service which would either have a negative workforce response or would drive up co-payments leading to further inequities in accessing primary care services. This is of particular concern in iwi-based primary care services which are currently not funded sufficiently to pay the Māori nurses they employ the same rate as nurses employed by DHBs, creating further inequity.

Q2 Do you have a view on the proposal to split out classes of Specified Treatment Providers into the separate classes in the table above, so payment rates can be differentiated in the future? Please provide reasons for your view.

NZNO Response:

The risk with this proposal is that ACC start paying different professions different rates for the same service. The assessment and services provided by nurses, medical practitioners and other health care professionals are based on client's care needs and should be paid the same rate irrespective of which professional delivers that service.

Q3 Do you have a view on the proposed 2.05 percent increase to the payments listed in Table 2 (Audiologists)? Please provide reasons for your view.

NZNO Response:

No

Q4 Do you have a view on removing all provisions that require deductions from regulated dental payments? Please provide reasons for your view

NZNO Response:

NZNO Members agree. The current deductions process penalises those who have taken care of their teeth to date and creates additional costs for these patients. The increased co-payment for affected patients could create an inequity between those who can afford the additional cost and those who can't.

Q5 Do you have any overall comments that you would like to make on the review or recommendations?

NZNO Response:

Whilst the benefits of moving to a biennial process is appreciated, there needs to be a mechanism for making exceptional changes when the occasion demands.

Nāku noa, nā

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