

13 December 2019

## **Consultation on ACC regulated payments for treatment**

To whom it may concern,

Osteopaths New Zealand (ONZ) is providing feedback on the current consultation regarding changes to regulated payments for ACC treatment to apply from 01 July 2020.

ONZ is the professional association for registered osteopaths in New Zealand. Our members work in the private healthcare sector, with the majority practicing as ACC Registered practitioners. These osteopaths often provide services for patients who have an injury covered by ACC under Cost of Treatment Regulations (CoTR). In many cases patients will lodge an ACC Claim through their osteopath as their first point of contact.

ONZ has views on:

1. the proposal to split out the classes of specified providers and

We have no submissions on either the changes for the proposed increases in payments, hearing loss services eligible for payment increases, or the proposal to remove deductions for dental treatment on teeth that have had prior work have.

### **1. Splitting out the classes of Specified Providers**

Whilst there may be some benefit to splitting the various Specified Providers into their own groups, we have some concerns as to the flow-on effects of this choice. Our members have experienced a bias within ACC toward Physiotherapy services, and we are concerned that separating the Specified Providers may reinforce biases toward or against some providers. This would ultimately impact patient's access to healthcare, and potentially impact patient outcomes. If a split were to occur, we recommend that when the time came to assess each provider group that the professional body for each group be fully consulted individually in regard to potential payment changes. As each profession varies with payment rates, levels of clinical expertise, and time spent with patients, we recommend consideration be given to providing patients with advantageous access to appropriate healthcare.

Thank you for the opportunity to submit on this matter.

The primary contact for matters relating to this submission is:

Rochelle Judkins  
President  
Osteopaths New Zealand  
Email: [president@osteopaths.nz](mailto:president@osteopaths.nz)

Yours sincerely,

A handwritten signature in blue ink that reads "Rochelle Judkins". The signature is written in a cursive style with a large, sweeping flourish at the end of the name.

Rochelle Judkins

President of Osteopaths New Zealand