



The Royal Australian and New Zealand College of Radiologists®

10 December 2019

Accident Compensation Policy
Ministry of Business, Innovation, and Employment
PO Box 1473
Wellington 6140

Sent to: ACregs@mbie.govt.nz

Re: Consultation on ACC regulated payments for treatment

Thank you for the opportunity to provide feedback on the Ministry of Business, Innovation & Employment's (MBIE) consultation on ACC regulated payments for treatment.

The Royal Australian and New Zealand College of Radiologists (RANZCR) is the peak body advancing patient care and quality standards in the clinical radiology and radiation oncology sectors. RANZCR represents over 4,500 members in New Zealand and Australia, including over 600 in New Zealand. RANZCR's role is to drive the safe and appropriate use of radiology and radiation oncology to optimise health outcomes through leadership, education and advocacy.

We note that MBIE is consulting on the following three proposals relating to increasing regulated ACC payments for treatment:

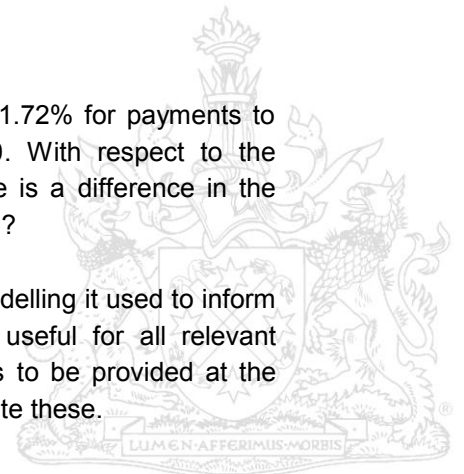
- **Proposal One:** Implement a general increase of 2.05% for regulated treatment payments, and an increase of 1.72% for payments to Radiologists and providers of Hyperbaric Oxygen.
- **Proposal Two:** Create individual profession groups from the group currently known as 'Specified Treatment Providers' and specify payment rates for each (physiotherapists, chiropractors, occupational therapists etc.).
- **Proposal Three:** Remove provisions that reduce ACC's contribution for dental treatment on teeth that have had previous non-injury related work.

We note that the main stated policy objectives for considering cost of treatment contributions are recognising cost pressures in the health sector and the need to balance the need for claimants to have access to treatment by ensuring co- payments are affordable, costs to ACC are sustainable and predictable, and payments do not cause alignment issues in the health sector.

Proposal One - Rates increase

This proposal would see treatment rates be increased by 2.05%, and 1.72% for payments to Radiologists and providers of Hyperbaric Oxygen from 1 July 2020. With respect to the treatment rate increase, RANZCR seeks clarification around why there is a difference in the proposed increase for radiology compared with other treatment providers?

We are disappointed that MBIE did not provide details of any data or modelling it used to inform the rates increases that are being proposed. In future it would be useful for all relevant information relating to proposed increases to regulated ACC payments to be provided at the outset of consultations in order to give the sector sufficient time to evaluate these.



RANZCR thanks MBIE for the opportunity to contribute to this consultation. We look forward to receiving the additional clarification we have requested. For further information, please contact our New Zealand branch office directly on 04 472 6471 or at NZbranch@ranzcr.org.nz.

Yours Sincerely,

Dr Gabriel Lau

Chair, New Zealand Branch

The Royal Australian and New Zealand College of Radiologists