

5 September 2011

Accident Compensation Scheme Policy
Policy and Research Group
Department of Labour
PO Box 3705
Wellington

By Email: COT@dol.govt.nz

Consultation on proposed amendments to the Cost of Treatment Regulations

Thank you for the opportunity to comment on the proposed changes to the Cost of Treatment regulations to general practitioners.

We are pleased to see a proposed increase to these regulations but we note that the rate is significantly below CPI (2 % as opposed to even the current rate of 5.3%) and takes no account that the fees have not been increased since 2006.

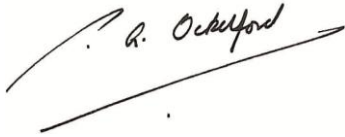
In addition we note that the current schedule of fees for vocationally registered general practitioners is less than that for non-GP specialists. A vocationally registered general practitioner is recognised as a specialist general practitioner and therefore the starting point for the fee schedule, (before CPI increases are added), should be commensurate with that for specialists for those general practitioners who are vocationally registered..

For these reasons we believe that the increase is insufficient. The true value of the ACC contribution to the fee has decreased over time. In most cases the increased cost has been and will continue to be passed on to patients with the end result that some patients have chosen, and will continue to choose, to forgo treatment and rehabilitation. Looking after these patients in the long term may therefore prove more costly to the government.

Accordingly, while we support an increase in the cost of treatment regulations, our support of the increase should not be interpreted as support of the rate proposed. The latter should reflect the true increase in the cost of providing ACC services.

Finally we note that the review of these fees has been tardy. In order to keep abreast with inflation we recommend these fees are reviewed annually..

Kind Regards

A handwritten signature in black ink, appearing to read "Dr Paul Ockelford". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Dr Paul Ockelford
Chair, NZMA