

25 September 2013

Dr David Bratt
Principal Health Advisor to MSD
Ministry of Social Development
P O Box 1556
Wellington 6140

Independent Work Ability Assessments - Providers

Dear David

Thank you for inviting the New Zealand Medical Association (NZMA) to provide feedback on MSD's draft Independent Work Ability Assessments (IWAA) Providers document.

The NZMA is the country's largest voluntary pan-professional medical organisation with over 5,000 members. Our members come from all disciplines within the medical profession and include general practitioners, specialists, doctors-in-training, and medical students. The NZMA aims to provide leadership of the medical profession, and promote professional unity and values, and the health of all New Zealanders.

In order to formulate our response to MSD, we have consulted with our General Practice Advisory Council, Specialist Advisory Council and the NZMA Board. We note that the request for feedback by MSD was made on 12 September with a deadline of 20 September. We are disappointed with this very short consultation period and trust that you will give consideration to our submission even though we have not been able to meet the requested time frame.

The NZMA is fully aware of the health benefits of meaningful work and we support, in principle, the aspiration of assisting people with health conditions or disabilities to return to work, to the extent this is appropriate and in the best interests of the individual patient. However, we have two major concerns relating to the draft document on IWAA providers. These concerns are outlined below.

Our first major concern relates to the inclusion of 'vocational practitioners' among the range of practitioners identified by MSD as being suitable to provide the assessments. Our understanding is that 'vocational practitioners' may have no healthcare background at all and

are not registered medical practitioners. Rather, their primary qualifications are in Career Development. Given that the target population for these assessments includes patients with mental health conditions (40%), musculoskeletal system disorders (15%) and people with a range of other conditions such as cardiovascular disease, chronic respiratory diseases, diabetes, cancer and nervous system disorders, the NZMA believes there are significant risks in engaging the services of non-healthcare workers to review medical information and discuss recommendations on condition management or treatment.

We submit that the role and importance of front line general practitioners appears to have been underplayed in this proposed list of assessment providers; this group of medical practitioners (not just those general practitioners with qualifications in occupational medicine) are well placed to understand a patient's health-related and other barriers to employment, and we believe they have useful experience to offer MSD in relation to the objectives of this assessment.

Our second major concern relates to the duality of a role in which a seemingly independent assessor is paid by MSD to undertake an assessment of an MSD client but then also provides advice and recommendations on the management for the individual concerned. To avoid a conflict of underlying motivations, we believe that better practice would entail some sort of firewall between these two roles. Such a separation of roles would also be consistent with what occurs in other spheres (e.g. assessments in the military and for members of sports teams).

Finally, we suggest that it would generally be more appropriate for MSD to liaise with the patient as well as their general practitioner when formulating an assessment of their work ability. Where independent assessments are required, we suggest that these are best undertaken by a general practitioner who is not the patient's own general practitioner. While we appreciate that MSD is keen to avoid an over-medicalised model, we believe that general practitioners and other health professionals (e.g. psychiatrists or psychologists where mental health concerns dominate) are best placed to undertake assessments that focus on how a patient's health condition or disability impacts on their potential for employment.

We trust that our comments are helpful and we would be very interested to learn the outcome of these consultations.

Yours sincerely



Dr Mark Peterson
NZMA Chair