

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 does not take into account that the fees have not been increased since 2006.

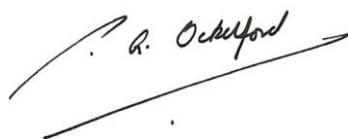
In addition we note that the current schedule of fees for vocationally registered general practitioners is less than that for specialists. A vocationally registered general practitioner however, is a specialist in their own right and the starting point for the fee schedule, (Before CPI increases are added) for vocationally registered general practitioners should be commensurate with that for specialists.

For these reasons we believe that the increase is insufficient. Further, because the true value of the ACC contribution to the fee has decreased over this time in most cases the increase in 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 is likely to prove more costly to the government.

According 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 provided which we think should reflect the true increase in the cost of providing ACC services over that time.

Finally we note that the review of these fees has been tardy. In order to keep abreast with inflation we believe these fees need to be reviewed on an annual basis.

Kind Regards



Dr Paul Ockelford
Chair, NZMA