



## **Amendment to accident compensation regulations related to treatment and services ancillary to treatment**

Consultation on proposed changes to the Accident Compensation (Liability to Pay or Contribute to Cost of Treatment) Regulations 2003, the Accident Compensation (Apportioning Entitlements for Hearing Loss) Regulations 2010 and the Injury Prevention, Rehabilitation, and Compensation (Ancillary Services) Regulations 2002.

Please read the [consultation document](#) before submitting your comments.

Submissions may be made to:

**Email:** [ACregs@mbie.govt.nz](mailto:ACregs@mbie.govt.nz)

**Post:**

Consultation on Accident Compensation Regulations change proposals

Health, Safety and Compensation Team

Labour and Commercial Environment Group

Ministry of Business, Innovation and Employment

PO Box 3705

Wellington, 6140

Submissions close at 5pm on **Friday 4 October 2013**.

**Your Details**

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I am responding:

☐ on behalf of an organisation (please specify):

**New Zealand Nurses Organisation**

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Please tick to describe the type of organisation:

- ☐ Treatment provider group
- ☐ Business representative organisation/industry group
- ☐ Trade Union
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## Submission

### Proposal 1: Increase regulated rehabilitation prices by 1.78 per cent.

- Increase most regulated rehabilitation prices by 1.78 per cent under both the:
- Accident Compensation (Liability to Pay or Contribute to Cost of Treatment) Regulations 2003 (Cost of Treatment Regulations); and
- Accident Compensation (Apportioning Entitlements for Hearing Loss) Regulations 2010 (Hearing Loss Regulations).

#### Question

What is your view of the proposed increase of 1.78 per cent to all payments under the Cost of Treatment Regulations and the Hearing Loss Regulations?

The New Zealand Nurses Organisation believes an increase of 1.78 percent is inadequate. We note the reduction in ACC levies proposed by ACC and steadily reducing ACC coverage - the increased threshold for hearing loss, removal of the requirement for vocational rehabilitation and fulltime hours reduced to 30 hours, for example - all of which negatively impact health practitioners (many of whom are sole traders) providing these services. We also note proposals to decrease levies, and a significant turnaround in ACC's circumstances from the deeply misleading reports of serious financial trouble used to justify reduced entitlements, introduce competition in the work account and intensify experience rating. Clearly these initiatives were informed by ideology rather than evidence, even that provided in the [PriceWaterhouseCoopers Report](#) ACC commissioned (2008).

Indications from NZNO members strongly suggest people are finding it difficult to access the rehabilitation they need since ACC moved to reduce the number of providers. We take this opportunity to remind you of the Woodhouse Principles that informed the crossparty support for establishing the ACC as a publicly-owned single provider of a 'no fault' compensation social insurance system for all New Zealanders in return for giving up the right to sue for workplace injury. That obligations of that social contract remain: ACC has a responsibility to provide injury prevention, treatment, complete rehabilitation and compensation for injured claimants and that must include considerations of equitable



access to appropriately qualified health practitioners. Inadequate payments will further undermine the latter, to the detriment of the former. NZNo advises these payments be lifted.

### **Proposal 2: Technical amendment 1**

- Add the words “or crown” to item DN7 in the dental lists of the Schedule to the Cost of Treatment Regulations.

#### **Question**

What is your view of the technical amendment to amend the dental list in the Schedule to the Cost of Treatment regulations?

NZNO supports the amendment

### **Proposal 3: Technical amendment 2**

- Delete Regulation 6(3) from the Injury Prevention, Rehabilitation, and Compensation (Ancillary Services) Regulations 2002.

#### **Question**

What is your view of the technical amendment to delete Regulation 6(3) from the Ancillary Services Regulations?

NZNO supports the amendment