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Tēnā Koe

Vocational Rehabilitation RFI

The New Zealand Nurses Organisation (NZNO), welcomes the opportunity to comment briefly on the above document from the professional nursing perspective. Nurses are a key component of the VR workforce and work with medical and allied health colleagues, patients and families. We note that this document introduces some new aspects of VC service provision which were not canvassed at the vocational working party facilitated by ACC, which some providers may be unaware of.

There are two areas of the RFI which we believe need further consideration and tightening to ensure that services are delivered by an appropriately trained and experienced workforce, and that that workforce is available. Practitioners regulated under The Health Practitioners Competence Assurance Act 2003 (HPCA), which include occupational therapists (OT), physiotherapists, and nurses – nurse practitioners (NP), registered nurses (RN) and enrolled nurses (EN) – are already subject to robust processes to ensure current competence and fitness to practice within a defined scope. We note that the New Zealand Occupational Health Nurses Association (NZOHNA) is an *association*, not a responsible authority (RA) with legislated authority under the HPCA Act and suggest that the RFI distinguish between the two.

The sudden introduction of an additional requirement for a formal tertiary qualification in rehabilitation – i.e. an undergraduate degree or post graduate diploma in rehabilitation, such as the NIDMAR qualification offered at Otago Polytechnic, may unnecessarily exclude, or adversely affect employment opportunities for experienced clinicians currently working in rehabilitation. NZNO strongly recommends that their expertise is recognised and formalised, by developing a transition pathway to what will be the new requirements, without jeopardising the current skilled workforce. Recent models for such transition pathways could include transitions to the EN expanded scope of practice, and the (imminent) registration of anaesthetic technicians (AT). With the latter we note that membership of the Society of AT is one of the pathways to immediate registration, and it may be useful to consider this in the context of membership of the NZOHNA for VR nurses. We strongly recommend a lengthy phasing in of new qualification requirements

to avoid creating a shortage of expertise in an area where one already exists. Similarly we note the need for continuing professional development, since a qualification alone does not guarantee current skills and knowledge.

NZNO has particular concerns around the lack of provision for ensuring appropriate specialist VR services, for example, for brain injury, spinal injury, sensitive claims, burns, amputees, and highly complex injuries. In general, apart from a few services such as the psychological service contract, once a contract is given, there are no ACC checks or restrictions on who is employed or that they are appropriately trained and qualified to deliver services in specialist areas. For example, a VR burns specialist would have different skills to those required for appropriate VR for a brain injured person. NZNO recommends that the contract include a requirement to provide *evidence* that where a tailored service is being provided, there are appropriately trained and qualified personnel to deliver it.

We trust the foregoing is of assistance. NZNO would be pleased to be involved in any further discussion about VR services.

Nāku noa, nā



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ABOUT NZNO

NZNO is the leading professional and industrial organisation for nurses in Aotearoa New Zealand, representing over 45 000 nurses, midwives, students, kaimahi hauora and health workers on a range of employment-related and professional issues. Te Runanga o Aotearoa comprises our Māori membership and is the arm through which our Te Tiriti o Waitangi partnership is articulated.

NZNO provides leadership, research and support for professional excellence in nursing, negotiates collective employment agreements on behalf of its members and collaborates with government and other agencies throughout the health sector. Nurses are the largest group of health professionals comprising half the health workforce.

The NZNO vision is “Freed to care, Proud to nurse”. Our members enhance the health and wellbeing of all people of Aotearoa New Zealand and are united in their professional and industrial aspirations to achieve a safe, sustainable and accessible system of public health care for all New Zealanders.