

16 May 2024

Kia ora,

**Submission on changes to ACC regulations for Chinese Medicine, Paramedics and Audiometrists**

Thank you for the opportunity to make a submission on changes to ACC regulations for Chinese Medicine, Paramedics and Audiometrists. Hauora Taiwhenua Rural Health Network has a vision of healthy and thriving rural communities in Aotearoa New Zealand. We strongly support the proposed changes as they will contribute to achieving this vision.

The need for clinical services is unprecedented, with a growing older population with more complex health needs and an existing workforce which is struggling to cope currently, and certainly cannot in the future. These needs are exacerbated in rural communities where the immense pressure placed on the rural health workforce to meet that need is well-documented.

The development of the clinical workforce beyond traditional General Practice models into comprehensive rural primary care teams empowered to work to a full and varied scope of practice is critical to achieving this. Many rural health services have already welcomed extended care paramedics into their comprehensive teams and enable them to work across pre-hospital and primary care services. Unfortunately, while they are a highly valued member of the clinical team, the potential of this has been severely constrained by regulations that do not reflect these contemporary and increasingly well evidenced clinical service developments.

The proposed changes to ACC regulations are a sound and progressive solution to addressing this issue and enable these highly valued clinicians to work effectively and be appropriately remunerated for their work.

In supporting the changes to the ACC regulations, we considered:

- That the clinical and professional competencies of all health workers, including paramedics, is maintained through their registration and engagement with their professional boards or colleges.
- The positive impact the changes will have towards enabling equitable access for patients, particularly in more remote areas where providers balance the tension of meeting rural community service needs 24/7, with a very small pool of qualified health personnel.
- The positive impact that enabling and broadening the scope of practice, and the opportunity for new career pathways will have on sustaining and retaining the paramedic workforce.
- Setting co-payment levels that make care and rehabilitation after injury more accessible and enable individuals to return to work in rural areas.
- The potential risk of paramedics moving away from first responder roles into primary care, being mitigated by the significant increase in paramedicine trainees when contrasted with the much lower increase in numbers of medical and nursing trainees.

**Hauora Taiwhenua response to specific submission questions:**

**Question 3.1** Do you agree with amending the definition of acupuncturist in the Definitions Regulations to recognise the Chinese Medicine Council as the regulator, to ensure acupuncturists continue to be funded by ACC for providing covered treatment?

**Hauora Taiwhenua:** Yes

**Question 3.2** Do you agree that adopting option B, extending ACC treatment injury to all regulated Chinese medicine practitioners, best meets the objectives set?

**Hauora Taiwhenua: Yes**

**Question 4.1** Do you agree that adopting option B, commencing to fund paramedics for ACC treatment, best meets the objectives set?

**Hauora Taiwhenua: Yes**

**Question 4.2** Do you agree that adopting option B, adding the above paramedic treatment rates to the Cost of Treatment Regulations, best meets the objectives set?

**Hauora Taiwhenua: Yes**

**Question 4.3** Do you agree with adding paramedics as registered health professionals in the Definitions Regulations to ensure their treatment continues to be covered by the ACC treatment injury provisions?

**Hauora Taiwhenua: Yes**

**Question 5.1** Do you agree that adopting option B, commencing to fund audiometrists for ACC treatment, best meets the objectives set?

**Hauora Taiwhenua: Yes**

**Question 5.2** Do you agree that adopting option B, making all audiologist treatment rates also apply to audiometrists, best meets the objectives set?

**Hauora Taiwhenua: Yes**

**Question 5.3** Do you agree with updating the definition of audiologist in the Definitions Regulations to make it consistent with the NZAS constitution?

**Hauora Taiwhenua: Yes**

**Question 6.1** Do you agree with updating the definition of nurse in the Cost of Treatment Regulations to make it consistent with the new scope of practice for nurses? P

**Hauora Taiwhenua: Yes**

Nga mihi,



Dr Grant Davidson  
Chief Executive

**Hauora Taiwhenua Rural Health Network**

