

**Public Submissions
Review of Workplace Safety – ACC Policy
Dept of Labour
PO Box 3705
Wellington**

Attention Mrs Salter

14th August 2007

Ref: Submission Document for Post Draft Report hearings.

Dear Diane

I am overseas until 30th August and therefore am unable to present at the hearing.

Please take the following comments into account.

Ref – My status as an expert witness for the NZSP and NZPPA is incorrect – I was presenting as an individual associated with PTNZ – please correct. I am happy to be identified as an expert witness, but did not sign the associated statement that was required.

I find the aspect of the draft report that I have interest in to be on the whole very pertinent to the situation and the coverage is certainly excellent.

The recommendations in regard to Certification and EPN are my main area for comment – as follows: -

Ref. EPN – The recommendation that the EPN scheme be abandoned in favour of a “Contracted Provider” status for all providing treatment services to ACC under contractual arrangements is I believe appropriate.

This move would result in the removal of a two tier service provision for patients and in turn remove an anomalous identification of one group of providers as “preferred” and another by inference not “preferred” when both groups are trained the same and may or may not have Post Graduate Qualifications but must have achieved Certification for The Practice.

The common ‘qualifiers’ for the owners of the Physiotherapy business to hold an EPN contract are, achieve certification, membership of ‘The College’, membership of the NZSP and be approved by ACC under certain approved conditions. Clinical expertise is not a qualifier. My following comments on Certification as a Qualifier also refer.

Ref. Certification and Post Graduate Qualifications as a Qualifier’

The recommendation that Post Graduate Qualification be treated as a parallel qualifier for Certification is I believe not appropriate for the following reasons.

- Certification to a Standards New Zealand set of ‘Standards’ requires The Practice to meet the intention of the service Standards on which the activities of the business is proven (by audit) to be operating.
- The Audit will include evidence of Staff qualifications, CPD portfolio, in service education and the management of a quality system within The Practice. Post Graduate Qualifications are not a required feature.
- Were post graduate qualification to be treated a parallel qualifier to Certification, for the awarding of an ACC contract (EPN or otherwise) then the goodwill generated by Post Graduate qualifications will leave with the departing Physiotherapist.

- Certification is gained by The Practice and although the incoming owner has to complete their part of Certification qualification the goodwill generated by Certification remains (especially where Certification is a qualifier for a contract being awarded).
- *Put succinctly, the value of Certification remains with the business, Post Graduate qualification are portable and move with the Professional holding them. It is now almost impossible to sell practice that is not certified.*
- The Certified practice must comply with all related legislation and this includes the Health Practitioners Competency Act – legislation which defined what Health Professionals working within the Practice will do in order to maintain their Annual Practising Certificate. There is a periodic audit process of the CPD portfolios.
- My experience as an auditor, developer of certification systems and work as a health professional myself leads me to believe that Post Graduate qualification of themselves does not necessarily confer the ability to operate a healthcare service (business) within the requirements of the various legislation.
- Aspects of Health and Safety, Employment, Governance etc or specific health legislation e.g. Health and Disability Commissioner, Health Information, Privacy, Human rights legislation etc are not usually part of a Post Graduate Qualification.
- Certification aims to support the safety of the client when in the services and safeguards their information, privacy quality of staffing resources etc.)
- In my view, if recognition or Post Graduate qualification is important (and many think that it is) the relevant Post Graduate Qualification recognition considerations could include: -
 - Recognition the status of relevant Post Graduate qualified Physiotherapists
 - By:
 - PG Holders attracting premium payments for service rendered.
 - Treatment number threshold approvals could be higher for PG holders.
 - Complex treatment sub contracts could be awarded to Physiotherapists holding relevant PG qualification.
 - Use the PG experience nationwide to develop acceptable treatment profiles for both simple and complex cases.

Ref Outcome Measures and Reporting

The report states, there is no formal measurement or quantifiable and/or reliable evidence of improvements in service delivery outcomes as the result of Certification. However, Certification requires that the independent Audit agencies record evidence of Consumer satisfaction surveys that indicate satisfaction or dissatisfaction with the services being certified.

Since Certification (previously known as Accreditation) commenced, there have been well over 1000 consumer surveys evidenced as completed by Community Physiotherapy Auditors. But no published collation of these data to support the hypothesis that consumer satisfaction improves as the result of Certification over and above any other qualifiable systems ie Post Graduate input.

Similarly there is no comparable evidence that the possession of Post Graduate qualification improves consumer satisfaction on any similar basis to what Certification requires. As far as I know, there are no mechanisms in place that allow for such comparisons to be achieved.

Bruce Monkton

August 14th 2007

