

New Zealand Speech-language Therapists' Association (Inc.) Te Kahui Kaiwhakatikatika Reo Korero o Aotearoa

Affiliated to the International Association of Logopaedics and Phoniatrics

8 August 2008

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Submission from New Zealand Speech-Language Therapists' Association on changes to the IPRC Act and development of new regulations

1. Proposal to align ACC registered health professionals with the framework set out in the HPCA Act?

It would seem appropriate that the inclusions, definitions and scope of practice of registered health professionals be aligned with those in the HPCA Act and that all those health professions are recognised as providers by ACC, thereby ensuring claimants are funded to access their services. However, it is important to acknowledge that at this time several health professions (including speech-language therapy) are not covered by the HPCA Act and have been informed that progression towards inclusion under the Act is on hold while the Act itself is being reviewed. Health professions such as speech-language therapy should continue to be considered as valuable a service provider (to claimants) as those professions covered by the HPCA Act. Access to such health professions must be maintained.

2. New health practitioner groups under the HPCA Act being added to the definition of registered health professionals, with the consequence that these groups would be covered under the treatment injury provisions of the IPRC Act

It is our position that when the HPCA Act recognises a health practitioner group (for example speech-language therapy) then ACC would be wise to acknowledge this and offer these services to their claimants under the treatment injury provisions of the IPRC Act.

3. Proposal to align the counsellor regulations with the framework set out in the HPCA Act

It is important to distinguish counselling services from psychology services. Although both are of value, they are very different services and a clear distinction should be made by ACC. The proposed amendments would make these distinctions whilst also regulating a non registered profession.

4. Proposal to require counsellors to have at least two years experience before they can provide services for ACC

Length of service is not always correlated with quality of service. There are some excellent newly qualified service providers. However, rigorous professional supervision should be provided for counsellors with less than two years experience. It may be prudent to consider some restrictions on recently qualified counsellors providing services to Serious Injury or Sensitive Claims.

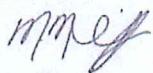
5. Proposal to remove specific named employer bodies from the counsellors' regulations

The removal of employer bodies is entirely appropriate, quality should be measured and maintained by a professional body rather than an employer who has contractual demands and budgets to balance against quality service provision. The professional body's standards are less likely to be influenced by such external factors.

6. Proposal to align counsellor qualifications with appropriate qualifications under the New Zealand Qualifications Framework

This would seem to be appropriate however a grand-parenting system may be considered to enable highly experienced and competent counsellors who may have trained before the formal qualification requirements to continue to practise.

Thank you for the opportunity to make this submission.



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