



Dietitians NZ



Ngā Tohunga Mātai Kai

12th May 2017

The Manager Accident Compensation Policy
Ministry of Business, Innovation, and Employment
PO Box 1473
Wellington, 6140

Attention: ACregs@mbie.govt.nz

To whom it may concern

Re: CONSULTATION ON NEW PRACTITIONERS FOR REGISTERED HEALTH PROFESSIONAL AND TREATMENT PROVIDER DEFINITIONS

Thank you for the opportunity to comment on the proposed changes in this consultation document.

Dietitians are registered health professionals who meet standards required by the New Zealand Dietitians Board under the Health Practitioners Competency Assurance Act (HPCA) 2003. In New Zealand, by law, dietitians must be registered with the Dietitians Board and hold a current practising certificate, work within a specified scope of practice, participate in a continuing competency programme, and adhere to a Code of Ethics.

Dietitians New Zealand Incorporated (Dietitians NZ) is the professional association of registered dietitians and associated nutritional professionals. With a membership of approximately 640, we represent the largest group of fully trained food and nutrition professionals in New Zealand. Dietitians NZ exists to build a strong and sustainable profession that empowers New Zealanders around food and nutrition; and inspire change to enhance the health and wellbeing of Aotearoa, New Zealand. We trust the comments made in our submission will be given due consideration.

Since December 2011, dietitians in New Zealand have been able to become Designated Prescribers for subsidised non-prescription items for therapeutic nutrition from a list of permissible products (Special Foods, Vitamin, Minerals, Oral Electrolytes and three medicines for the management of chronic illnesses after diagnosis by a medical practitioner).

Registered dietitians who have undergone further training to be legally endorsed as Designated Prescribers within their scope of practice must maintain their prescribing competency if they wish to continue to have this endorsement when applying for their annual practising certificate. The criteria for this includes having supervision from an experienced dietitian also with a prescribing endorsement; including prescribing related developments as part of their continuing competency; and completing the Dietitian's Board Annual Prescriber Update each year. Dietitians are the only registered and suitably qualified profession in New Zealand able to prescribe and manage therapeutic diets for patients, and provide nutrition supplements that will have the best outcome for the patients.

Dietitians NZ responds as follows to the questions drawn up by the Ministry of Business, Innovation and Employment.

Registered health professionals

General

Do you support the proposal to add eight occupational groups to the definition of registered health professional?

Dietitians NZ supports the addition of dietitians, along with other seven occupational groups, to the definition of registered health professionals. Without expertise pertaining to the other seven occupational groups, the remainder of this submission is in relation to the dietetic profession and workforce only.

What issues, if any, do you see in introducing the proposed regulations?

Dietitians NZ does not envisage any issues with including dietitians within the definition of registered health professional.

Do you consider that there are reasons any of the occupational groups should not be added to the definition of registered health professional?

Dietitians NZ does not perceive any reason that dietitians should not be added to the definition of registered health professional.

Impact on claimants

What impact do you consider the proposed regulations would have on patients who suffer an injury in the course of treatment by practitioners who are part of the occupational groups that would become registered health professionals?

As a non-physical modality, Dietitians NZ would expect limited physical injuries to result from dietetic input. It could also be expected that non-physical injuries related to the provision of nutrition care would be less as dietitians are appropriately trained and registered to provide such care. However, the inclusion of dietitians within the definition of registered health professionals allows greater support for claimants

suffering injuries that may arising from dietetic input which Dietitians NZ is in support of.

Impact on practitioners

What impacts do you expect the proposed regulations would have on the health practitioners that would become registered health professionals?

The inclusion of dietitians in the definition of registered health professionals reinforces the accountability of dietitians that they practice within their Scope of Practice and ensuring that they are competent and fit to practice to protect the health and wellbeing of the New Zealand public.

Do you consider that the proposed regulations could present any additional administrative or other costs to process treatment injury claims?

Dietitians NZ can not identify any additional administrative costs or other costs to process treatment injury claims.

Would you expect to see an increase in claims from the occupational groups that would become registered health professionals under the proposed regulations?

Dietitians NZ does not expect a rise in injuries and injury claims resulting from dietetic input if dietitians were to be added to the definition of registered health professionals.

Implementation

Do you anticipate there would be any issues in implementing the proposed regulations?

Dietitians NZ does not anticipate any issues in implementing the proposed regulations with regard to dietitians.

Treatment providers

General

Do you support the proposal to include pharmacists in the definition of treatment providers?

Dietitians NZ supports the proposal to include pharmacists in the definition of treatment providers. Pharmacy is an essential part of the healthcare system and pharmacists must be registered with the Pharmacy Council and hold an annual practising certificate.

In addition, Dietitians NZ would support consideration for the registration of dietitians as treatment providers. Similarly to pharmacists, this would allow greater dietetic input for community-based interventions using new methods of working and expanded treatment methods. Inclusion of dietitians as treatment providers would

allow more equitable, earlier and more cost-efficient access to dietetic services through:

- Single Discipline Assessment and review by dietitians of those where no other Training for Independence provider or input from other disciplines is necessary
- Direct referral to dietetic services to provide options for alternate medicine management services (of special foods, vitamins, minerals, oral electrolytes and pancreatic enzymes), further reducing pressure on general practitioners, who are arguably less suitable than dietitians to manage these products
- Direct referral to dietetic services for obesity management, fatigue, and fitness for return to work in vocational rehabilitation along-side physiotherapy only providers or gym-based rehab teams
- Self-referrals from ACC claimants provided the claim covered is secondary to injury and case managers accept purchase order approval for dietetic input (as currently for many private and partnership health insurance providers)
- Direct referral for nutrition assessment post bowel surgery and in treatment injury affecting the bowel where short stays in private and public hospitals prevent dietetic education being completed
- Direct referral for nutrition support prior and post surgery (pressure areas; kidney stones) in spinal cord injury where special needs dictate limitations on appetite; diet restrictions and healing
- Direct referral to Dietetic services where claimants are enteral feeding allowing immediate handover from Hospital dietitians to ACC dietitians for continuous care
- Direct referral to Dietetic services in children and adolescents with special needs as a result of birth injury to achieve appropriate growth percentiles where impairments may include dysphagia; reflux; and global developmental delay. This group of claimants do not have dietitians included in their MoH funded school-based therapies.

The benefits of including Dietitians as a Treatment Provider include:

- Transparent assessment of client progress from dietetic input as evident through nutrition Single Discipline progress and completion reporting direct to ACC
- Appropriate provision of nutritional therapy for claimants by engaging with registered dietitians (minimising the risk of other less-suitably trained health professionals providing well-meaning but ill-informed nutritional advice)
- Enhanced recovery for claimants where weight management (either gain or loss) is a requirement for recovery and rehabilitation
- Reduced risk of claimants developing diet-related long-term co-morbidities, which would otherwise present barriers to progress with other forms of medical and social rehabilitation.

Thank you again for the opportunity to make this submission. We ask that our comments be given due consideration.

Yours faithfully

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that form a stylized, somewhat abstract shape.

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Dietitians NZ**

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