



The New Zealand Psychological Society

Te Rōpū Mātai Hinengaro o Aotearoa

Submission on the ACC proposal to move treatment provider and registered health professional definitions into regulations; to amend existing definitions and add new definitions; and to amend the Accident Insurance ('Counsellor') Regulations 1999.

Introduction

The New Zealand Psychological Society is in support of the proposed changes outlined in the Consultation Document. In this submission we note issues which we believe need to be considered in implementing these changes.

Responses to questions

1. What do you think of the proposal to align ACC registered health professionals with the framework set out in the HPCA Act?

The New Zealand Psychological Society is supportive of the proposal to align ACC registered health professionals with the framework set out in the HPCA Act. We support the flexibility this will provide ACC.

2. What do you think about the 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?

The Society supports ACC in new health practitioner groups under the HPCA Act, being added to the definition of registered health professionals. We are very supportive of allowing a greater number of patients to benefit from the most suitable ACC funded treatment. We believe however that health practitioner groups need to be committed to evidence-based practice. We believe that it is important that ACC use its funds to purchase services for which there is scientific evidence of efficacy.

The addition of new treatment provider groups who do not have an authority under the HPCA Act, as noted in the consultation document, will need to ensure

that these groups meet new qualification and training criteria. We are supportive of this occurring and consider that it needs to be done within a context of evidence of efficacy.

3. What do you think of the proposal to align the counsellor regulations with the framework set out in the HPCA Act?

The Society supports this proposal.

4. What do you think of the proposal to require counsellors to have at least two years' experience before they provide services to the ACC

The Society supports this proposal and expects that ACC will also take into account the type of training and qualifications which counsellors (whether or not they are registered health practitioners) and other health professionals require to effectively work with ACC clients. ACC is already taking this approach with vocational counselling. We support the requirement that counsellors will need to be registered with an appropriate authority, have an appropriate scope of practice and be members of a professional body.

Psychologists who work for ACC will already be registered under the HPCA Act. If registered under the "General Scope" it is appropriate that two years experience be required. If they are registered under a specialist scope this requirement is inappropriate because the Psychologists Board will have already checked the qualifications and experience of these psychologists.

We note that much of the counselling work carried out for ACC is highly specialised and that some of this work may be more effectively and safely carried out by registered psychologists who have specialised training, relevant continuing professional development and qualifications in assessment and treatment.

5. What do you think of the proposal to remove specific named employer bodies from the counsellor's regulations

6. What do you think of the proposal to align counsellor qualifications with the appropriate qualifications under the NZQA framework

The Society believes that consistency in training standards is important for quality assurance and for patient safety.

7. Other Comments

The Society reiterates its view that ACC should regard psychologists as a separate category of provider of counselling services for sensitive claimants. We note that there is a discrepancy between ACC payment for these services and the fees charged by psychologists. We believe that this discrepancy is having an impact on the number of psychologists being willing to take up this work. We note also that ACC has not reviewed these fee levels for some years.

We attach our June 2008 submission which provides further detail on these important issues.

A handwritten signature in black ink, appearing to read 'Raymond Nairn', written in a cursive style.

Dr Raymond Nairn
President
New Zealand Psychological Society
7 August, 2008



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Submission to the Accident Compensation Corporation on the ACC Counsellor Category of Provider

The Issue

Psychologists are contracted to the ACC to provide counselling services to “sensitive claimants”. These psychologists are currently paid the same level of fee as other non-psychologist counsellors. Questions have been raised by members about the appropriateness of this current fee arrangement. Included in this submission are comments from a member who identifies the impact of the current situation on her and her professional practice (and that of her colleagues) as well as on sensitive claimants.

NZPsS Position

The NZPsS is of the view that ACC should regard psychologists as a separate category of provider of counselling services for sensitive claimants. We believe that ACC needs to raise the fee for psychologists to a higher level than for others providing counselling services to sensitive claimants.

This view is based upon the following:

Recognition of qualifications and expertise

Registered psychologists have completed postgraduate university training. The length of this training may equal or surpass that of medical practitioners depending on the level of specialisation and whether a PhD has been completed. Psychologists are registered practitioners under the HPCA Act and many of those working with ACC claimants have additional specialist registration as clinical psychologists.

Claimants' seeking out psychologists

Many sensitive claimants have complex presentations by virtue of their psychiatric histories and/or co-existing accident-related conditions such as

chronic pain and traumatic brain injury and prefer to be counselled by psychologists, often seeking out their services. Unlike counsellors, psychologists are trained to cope with these more complex presentations.

It is important that there are sufficient numbers of psychologists to ensure that sensitive claimants have a choice of a registered psychologist with whom to work.

An NZPsS member notes

"Effective treatment of those with sensitive claims has a great impact on the next generation, as most are mothers and their recovery translates to healthier children; from the opposite perspective, not treating these (mostly) women means that society is holding back from the most vulnerable group and in effect almost guaranteeing problems in generations to come. If society is genuinely interested in reducing family violence then continuing to provide effective and accessible treatment programmes for women, children and men with a history of abuse is a vital part of the solution.

Working within the sensitive claims area is an area requiring a high level of expertise and experience. Presenting issues are often very complex and there may be a high level of disorder (psychological, behavioural, emotional or relational). The current fee ACC pays is too low. Lack of appropriate funding for psychological treatment is a barrier for clients because fewer psychologists are willing to do the work (because of low pay and huge hurdles to become registered, not to mention paperwork, dealing with ACC, etc.). There is certainly a shortage of ACC Sensitive Claims treatment providers. Some anecdotal evidence of this from our practice comes from the receptionists who report having to turn away Sensitive Claims clients several times per week. Moreover, often this results in tears as clients state that they have tried everywhere in the area and cannot get an appointment to see anyone. At one stage we operated a waiting list, but this began to seem quite cruel given that clients would be on it for a year or more".

Workforce issues

In the course of ACC requiring re-registration, many of its psychologist providers in the counsellor category failed to re-register. This has resulted in fewer psychologists being available to claimants who want or have been advised specifically to see a psychologist. By having a separate and more appropriately funded category, some psychologists who did not re-register may be encouraged to reapply. This would address the problem that sensitive claimants have identified in locating practitioners prepared to offer counselling services to them.

Psychologists engaged in private practice receive fees of between \$135-\$180 per hour for counselling services. It is important for ACC to match or surpass these fee levels to attract sufficient numbers of psychologists to undertake this important work.

An NZPsS member notes

"Our practice's current ACC psychological services contract pays \$143.12 (plus GST, totalling \$161.00) per session, and includes provision for payment for DNAs and travel. As you will be well aware psychologists who see clients under the counselling regulations

are paid \$78.41 per session. DNAs and travel expenses are not covered under counselling regulations.

We feel that in some ways, the paltry amount ACC funds sensitive claims clients' treatment takes advantage of the goodwill of the psychologist who does sensitive claims work. In our practice, for example, the standard hourly rate is \$136 (plus GST, totalling \$153). It is the rare case when a sensitive claims client can afford a co-payment of \$76.40 per session (which are almost invariably weekly), which is what would be needed to equal our standard rate given what ACC pays (\$78.41). Two of us who have a reasonable number of sensitive claims clients on our caseloads, and charge them significantly lower co-pays, calculated that we lose approximately \$390 and \$200 per week, respectively, by treating sensitive claims clients. In the rare case of a sexually abused client who can afford the full standard fee, our colleagues without sensitive claims registration, can see them for the full fee without all of the hurdles we have undertaken to become registered and to complete paperwork for ACC. In addition, clients who are referred to do sexual abuse work under the Psychological Services contract are fully funded for treatment which seems to be a gross inequity.

Work with these clients is not suited to short-term treatment so requires a big commitment on the part of client and provider. A psychologist who is committed to treating this population is therefore making a big financial sacrifice. The clients, too, are making a big sacrifice if they agree to a co-pay of even \$25-30 per session, as they usually need to be seen weekly and for a year at the very minimum. In fact, most sensitive claims clients that we have on our books we have seen for two years or more. This huge financial commitment, often from women who are on the benefit and have dependents (therefore no real disposable income), seems quite unfair given that their "accident" was through no fault of their own, as compared say to a drunk driver who has a car accident or a weekend rugby player who injures his back or neck and incurs injuries for which s/he then owes no money for treatment through ACC".

In Summary

The NZPsS urges ACC to better recognise the professional qualifications and expertise of psychologists working to ensure that sensitive claimants are able to access the high quality counselling service psychologists are able to provide and to ensure that psychologists are attracted to practice in this important area of work.

Dr Raymond Nairn
President NZPsS

18 June, 2008