

Maggie Oulaghan  
ACC Business Manager  
Health NZ  
Te Tai Tokerau/Northland

18 October 2022

To: [ACregs@mbie.govt.nz](mailto:ACregs@mbie.govt.nz)

**Re: Updates to treatment regulations**

Thank you for the opportunity to comment as part of the consultation process on ACC regulated payments for treatment.

I respectfully request consideration of:

- Separate pricing table for Te Whatu Ora providers
  - in recognition of the higher costs in providing Te Whatu Ora services and the inability to charge a surcharge to patients
  - With the ever rising living costs people are increasingly unable to afford a surcharge demanded by the private sector
  - Risks of equity distortion whereby those who can't afford surcharges will have only two options – to forego treatment or be forced to wait in the public system with their rehabilitation and recovery ultimately slowed as their clinical needs are prioritised against all other presentations. The first options is unacceptable, the second presents an unfair burden on an already overloaded public health system
- Occupational Therapy prices should be aligned with other Allied Health Services pricing or preferably included in the Allied Health contract at equivalent pricing

With thanks

Regards

Ngā mihi  
**Maggie Oulaghan**  
**ACC Business Manager**  
**Finance / Te Tai Tokerau / Northern Region**