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ACC

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Tēnā koe,

Clinical Services Injection Code Review Update

About the New Zealand Society of Anaesthetists (NZSA)

The NZSA is a professional medical education society which represents over 750 anaesthetists and Specialist Pain Medicine Physicians (SPMPs) in New Zealand. Our members include specialist anaesthetists and SPMPs in public and private practice, and trainee anaesthetists. Our key roles are advocacy, facilitating and promoting education, and strengthening networks of anaesthetists nationwide. The NZSA, established in 1948, also has strong global connections and is a Member Society of the World Federation of Societies of Anaesthesiologists (WFSA).

Introductory comments

The NZSA welcomes the opportunity to represent our specialist pain medicine physician members and provide feedback on the finalised *Clinical services procedure codes and updated prices*. The NZSA supports the review's rational use of evidence-based interventions in the diagnosis and management of patients with pain and its efficient use of limited financial resources. However, we have concerns for the effects these changes will have on New Zealanders in pain. We would appreciate further transparency on this consultation and the evidence used to inform the changes and believe further consideration should be given to the pricing suggested and to segment the broad umbrella coding used for spinal injections.

Comments

Whilst we support the efforts this review is undertaking and the opportunity to provide feedback the process has been concerningly short and we would appreciate clarity on the consultation process, parties involved, and clinical evidence and research used to finalise this list and prices.

Currently accessibility in New Zealand to evidence-based effective interventional procedures is significantly less in comparison to other OECD countries, including Australia. It is our concern that the proposed service prices will further limit these by creating a financial barrier to SPMP in continuing these procedures for the following reasons:

- The reduced rates do not account for the rising costs of consumables, staff wages and facility rentals. The latter particularly when using imaging techniques such as fluoroscopy or CT that are only available at hospitals or radiology facilities and incur a high cost.
- The prices do not consider the skill level and training of the proceduralists, which is essential to minimise the risk of significant complications for the patients undergoing these procedures.

- Placing all spinal injections under the same umbrella does not account for their complex variations or facilitate effective auditing of interventions. Spinal injection procedures vary greatly in the clinical experience and skill required, the duration of the procedure, equipment costs and other associated expenses. In addition, a broad grouping of these increases the difficulties to audit the use of these interventions for specific conditions and purposes, for example, diagnostic vs treatment. Spinal injections would benefit from having a framework of different procedure codes to factor in these complexities.

Summary

The NZSA supports the work of this review in using evidence-based interventions in the diagnosis and management of patients with pain and its efficient use of limited financial resources. Our feedback details where we do have concern with these reviewed procedure prices and codes:

- Further clarity and transparency on the consultation and clinical evidence and research used to inform the review decisions would be appreciated.
- That the prices will further limit New Zealanders' accessibility to evidence-based effective interventional procedures in comparison to other OECD countries by introducing further financial barriers that do not account for rising costs or the skill levels of the specialists providing the services.
- The grouping of spinal injections does not account for the varying complexities of the procedures or allow for effective auditing and would benefit from a framework of different procedural codes.

We trust our feedback is useful and look forward to hearing further from the review team.

Yours sincerely, ngā mihi nui



Dr Sheila Hart
NZSA President