14 August 2026

Submission: Allied Health Aotearoa New Zealand (AHANZ)

Targeted Consultation – Proposed Changes to Streamline and Update ACC Regulations Submitted: August 2026

Introduction

Allied Health Aotearoa New Zealand (AHANZ) represents more than 40 allied health professions across Aotearoa New Zealand, including both ACC-funded professions (e.g., physiotherapists, occupational therapists, podiatrists) and professions not currently recognised within ACC pathways (e.g., music therapists, art therapists, diversional and recreational therapists, play therapists, clinical exercise physiologists, among others). AHANZ's membership reflects the breadth of the modern health workforce and the growing importance of psychosocial, rehabilitative, and therapeutic professions.

We welcome MBIE's targeted consultation and appreciate the opportunity to provide feedback. Our submission focuses on:

- Ensuring regulatory changes strengthen access, equity, and quality of care for ACC claimants
- Supporting a modern, flexible, culturally responsive allied health workforce
- Ensuring regulatory stewardship does not unintentionally exclude safe, competent professions
- Highlighting opportunities to better align ACC with contemporary health workforce realities
- Recommending future-proofed pathways for recognising all allied health professions, including self-regulated and emerging groups

PACKAGE 1 — Pharmacist Prescribers

1.1.1 – Should pharmacist prescribers be designated as treatment providers?

AHANZ supports designation. Pharmacist prescribers already operate within collaborative care teams and independently assess and prescribe within their scope. Their inclusion aligns with ACC's objectives of improved access, safe treatment, and alignment with the wider health system.

1.1.2 – Risks and benefits

Benefits

- Faster access to medicine management
- Reduced burden on GPs and nurse practitioners

- Better continuity of care for complex medication injuries
- Supports integrated primary care models

Risks

- Potential confusion for claimants about overlapping scopes
- Need for clear guidance on clinical boundaries
- Small workforce size may limit impact

1.1.3 – Treatment rates

AHANZ supports the proposed rates. They appear consistent with comparable primary care professions and reflect realistic salary and overhead assumptions.

1.1.4 – Additional considerations

- ACC should ensure clear communication to claimants and providers about scope boundaries
- Pharmacist prescribers should be included in future ACC workforce planning and data monitoring

PACKAGE 2 — Counsellor Regulations

Proposal 2.1 – Technical Updates

2.1.1 – Support for technical updates

AHANZ supports all proposed technical updates. They modernise outdated regulations and align with contemporary practice.

2.1.2 – Definition of counselling

The proposed definition is appropriate and reflects contemporary practice. It acknowledges counselling as a structured, collaborative therapeutic process, aligning with the diverse modalities used across allied health professions.

2.1.3 – Education requirements

The six listed areas reflect core competencies required for safe counselling practice. AHANZ supports inclusion of NZQA Level 6 minimum qualification.

2.1.4 – Definitions of “body” and “practising certificate”

We support these definitions. They provide clarity and reduce ambiguity, especially for professions regulated outside the HPCA Act.

2.1.5 – Removal of outdated supplier list

We agree. These organisations are no longer relevant to regulatory approval pathways.

2.1.6 – Updated list of bodies

The updated list appropriately captures the current landscape. AHANZ strongly supports aligning with responsible authorities where they exist.

2.1.7 – Alignment with Clean Slate Act

Increasing the threshold from 5 to 7 years is appropriate and aligns with national legislation.

2.1.8 – Expanded list of disqualifying convictions

We support inclusion of theft, dishonesty, stalking, and harassment offences. These align with safeguarding responsibilities for vulnerable clients.

2.1.9 – Additional considerations

- Cultural competence should be explicitly referenced in qualification and supervision expectations
- ACC should ensure Māori and Pacific counselling bodies are recognised where appropriate

Proposal 2.2 – Streamlining Registration

2.2.1 – Support for streamlined approach

AHANZ supports the fast-track pathway. It reduces administrative burden and recognises the robust quality assurance already provided by responsible authorities.

2.2.2 – Requirements for streamlined approach

The requirements are appropriate. We recommend adding:

- Evidence of cultural competence
- Confirmation of ongoing supervision arrangements

2.2.3 – List of bodies

We support the proposed list. It appropriately reflects professions with strong regulatory oversight.

2.2.4 – Additional considerations

- ACC should ensure emerging professions have a clear pathway to recognition
- A periodic review cycle (e.g., every 3 years) should be established for the fast-track list

Proposal 2.3 – Expanding Provider Types

2.3.1 – Preferred option

AHANZ supports **Option 3**: adding the Nursing Council and Occupational Therapy Board.

2.3.2 – Risks and benefits

Benefits

- Increased workforce capacity
- Reduced wait times
- Better alignment with multidisciplinary mental health practice

Risks

- Need for clear competency standards specific to counselling
- Risk of inconsistent practice if training requirements vary

2.3.3 – Additional considerations

AHANZ strongly recommends ACC consider future inclusion pathways for:

- Music therapists
- Art therapists
- Dance movement therapists
- Play therapists
- Diversional and recreational therapists
- Psychosocial practitioners
- Clinical Exercise Physiologists
- Hypnotherapists
- Chinese Medicine Health Practitioners

These professions provide structured therapeutic interventions that meet the proposed definition of counselling.

PACKAGE 3 — Lump Sum Regulations

3.1.1 – Preferred option

AHANZ supports **Option 4: Adoption of AMA6 as the standalone tool**.

3.1.2 – Benefits and risks

Benefits

- Modernised assessment aligned with contemporary medicine
- Improved consistency across assessors
- Better guidance for cancer-related impairments

Risks

- Potential reduction in mental injury compensation
- Need for robust training for assessors
- Transition period may create temporary inconsistency

3.1.3 – Additional considerations

- ACC should co-design mental injury assessment guidance with Māori and Pacific clinicians
- ACC should monitor impacts on claimant equity, especially for mental injury

PACKAGE 4 — Audiology Regulations

4.1.1 – Additional considerations

AHANZ supports adding audiometrists. This corrects a technical oversight and aligns regulations with current practice.

ADDITIONAL AHANZ-WIDE RECOMMENDATIONS

These recommendations reflect AHANZ's full membership list and the need for ACC to modernise its approach to recognising allied health professions.

1. Establish a Tiered Recognition Framework for All Allied Health Professions

ACC should adopt a future-focused framework recognising:

- HPCA-regulated professions
- Statutory regulated professions
- Self-regulated professions with governance, ethics, and competency frameworks
- Emerging professions with developing regulatory structures

This ensures safe expansion of the workforce while maintaining public protection.

2. Create a Formal Pathway for Self-Regulated Professions to Become ACC-Recognised Providers

AHANZ recommends ACC establish a transparent pathway for professions such as:

- Music therapists
- Art therapists
- Dance movement therapists
- Play therapists
- Diversional and recreational therapists
- Psychosocial practitioners
- Clinical exercise physiologists
- Nutritionists
- Massage therapists
- Medical herbalists
- Opticians/orthoptists
- Hypnotherapists
- Skin therapists
- Sonographers

These professions have established codes of ethics, competency frameworks, and supervision requirements.

3. Expand Counselling Provider Types Beyond Nursing and Occupational Therapy

ACC should consider recognising:

- Music therapists
- Art therapists
- Dance movement therapists
- Play therapists
- Diversional and recreational therapists
- Psychosocial practitioners
- Clinical exercise physiologists
- Nutritionists
- Massage therapists
- Medical herbalists
- Opticians/orthoptists
- Hypnotherapists
- Skin therapists
- Chinese Medicine Health Practitioners

These professions deliver structured therapeutic interventions aligned with the proposed definition of counselling.

4. Include Allied Health Expertise in Lump Sum Assessment Guidance

ACC should ensure allied health professions are involved in:

- Updating functional assessment guidance
- Designing culturally grounded assessment pathways
- Ensuring psychosocial and functional impairments are assessed holistically

5. Establish a Standing Allied Health Advisory Group for ACC

A permanent advisory group would support:

- Workforce planning
- Scope-of-practice reviews
- Emerging profession recognition
- Cultural safety and equity
- Service model redesign

6. Introduce a Transparent, Evidence-Based Process for Adding New Provider Types

ACC should publish:

- Criteria for inclusion
- Evidence requirements
- Safety and quality thresholds
- Consultation steps
- Timeframes

This supports workforce innovation and regulatory stewardship.

7. Develop ACC-Aligned Competency Frameworks for Emerging Professions

ACC should partner with AHANZ to develop:

- Competency frameworks
- Supervision models
- Training pathways
- Cultural safety standards

8. Strengthen Cultural Safety Requirements Across All Provider Types

ACC should embed:

- Te Tiriti o Waitangi obligations
- Māori and Pacific models of care
- Cultural supervision requirements
- Competency expectations for all professions

Closing Statement

AHANZ supports MBIE's intent to modernise ACC regulations and improve access, safety, and consistency for claimants. We encourage MBIE and ACC to continue engaging with allied health professions, including emerging and self-regulated groups, to ensure the regulatory environment remains responsive to Aotearoa's evolving health needs.

Ngā mihi nui,

Orquidea Tamayo Mortera (Co-Chair)

Allied Health Aotearoa New Zealand (AHANZ)