

27 July 2021

Emma Prestidge  
Ministry of Health

By email: [EOLC@health.govt.nz](mailto:EOLC@health.govt.nz)

## **Funding of assisted dying services**

Dear Emma

Thank you for inviting the New Zealand Medical Association (NZMA) to provide feedback on the above consultation. The NZMA is New Zealand's largest medical organisation, with about 5,000 members from all areas of medicine. The NZMA aims to provide leadership of the medical profession, and to promote professional unity and values, and the health of all New Zealanders. Our submission has been informed by feedback from our Board and Advisory Councils.

We note that the current consultation relates to some of the details related to assisted dying funding, which will be captured in a section 88 Notice, and accompanying service description. We understand that the decision to fund assisted dying services using a section 88 Notice, and to provide this funding through modules, is based on a desire to:

- enable individual practitioners to opt-in to provide services and claim funding
- allow funding to be accessed on an equal basis by practitioners working in a range of settings
- provide some flexibility in the requirements imposed on practitioners, and allow for these to be amended via a simple, transparent process
- align with expected changes that will take place through the Government's health and disability system reforms
- ensure that funding can be in place by 7 November 2021.

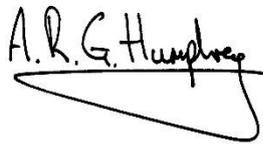
Our view is that funding assisted dying services via a Section 88 notice is a sensible approach given the small number of likely providers across multiple settings. We note, however, that the five proposed payment modules will only cover what is in the End of Life Choice (EOLC) Act after the process has formally started. As such, activities such as a GP having a patient-initiated conversation about assisted dying and referring them to an attending medical practitioner who offers assisted dying is not funded.

We understand that the funding amount for each of the five modules (which correspond to the different stages in the process) has yet to be determined but will be calculated on an hourly dollar rate and the expected number of total hours for each module. A drawback with the section 88 Notice approach is that fees are not negotiated, and any increases or adjustments are determined unilaterally by the Ministry. This is an aspect that has been a longstanding issue with the section 88 maternity services notice. We note that as the Government has determined that EOLC will be fully funded, there is no option for co-payments. We understand that EOLC services in public facilities or anywhere with full public funding will not be able to claim section 88 payments.

One suggestion that has been made is whether there could be a sixth module that enables funding for post euthanasia services such as supporting family / whānau of a person that has received assisted dying.

We hope our feedback is helpful.

Yours sincerely

A handwritten signature in black ink that reads "A. R. G. Humphrey". The signature is written in a cursive style and is underlined with a long, horizontal stroke.

Dr Alistair Humphrey  
NZMA Chair