



18 July 2018

Our Ref: MT18-443

Standards Working Group
Ministry of Health
P O Box 5013
WELLINGTON 6140

By email: standards@health.govt.nz

Dear Standards Working Group

SNOMED CT Subset Development for National Patient Flow: general paediatrics and child development services.

Thank you for giving The Royal New Zealand College of General Practitioners (the College) the opportunity to comment on the draft SNOMEDCT Subset Development for National Patient Flow: general paediatrics and child development services (the draft subset).

Introduction to general practice and the College

General practice is the medical specialty that treats patients: with the widest variety of conditions; with the greatest range of severity (from minor to terminal); from the earliest presentation to the end; and with the most inseparable intertwining of the biomedical and the psychosocial. General practitioners (GPs) treat patients of all ages, from neonates to elderly, across the course of their lives.

GPs comprise almost 40 percent of New Zealand's specialist workforce and their professional body, The College is the largest medical college in the country. The College provides training and ongoing professional development for GPs and rural hospital generalists, and sets standards for general practice. The College has a commitment to embed the three principles (participation, partnership and protection) of Te Tiriti o Waitangi (Treaty of Waitangi) across its work, and to achieving health equity in New Zealand.

Health equity is the absence of avoidable or remediable differences in health outcomes and access to health services among groups of people, whether those groups are defined socially, economically, demographically, or geographically (WHO). To achieve health equity, we advocate for:

- A greater focus on the social determinants of health (including labour, welfare, education, housing, and the environment).
- Funding and support to sustain the development of a GP workforce of sufficient capacity to meet population need for access to quality primary medical care, particularly in rural and high need areas.
- Sustained focus on measures to reduce smoking and to increase healthy food options for low-income families.
- Improved integration of primary, community, and secondary care health and social services which ensures the provision of high quality services.
- Universally accessible free primary health care for children and low-income families, because health inequities begin early and compound over the life course.
- A review of the funding model for primary care to ensure that resourcing is allocated equitably across diverse populations with differing needs.

Your consultation

We understand that SNOMED CT is the universal system of clinical terminology to capture structured information about patients, conditions, interventions and outcomes at point of care. SNOMED is the Ministry of Health's preferred solution for clinical terminology, and will be used in the National Patient Flow collection to classify referrals. You are seeking feedback to the draft SNOMED subsets (subsets) for general paediatrics and child developmental services.

Submission

The College commends the Ministry's work in this area. There are two main points that we wish to submit on.

Firstly, the College is concerned that the draft subset does not adequately reflect the many diagnoses that are common in children. There appears to be some significant omissions. For example, *otitis media* is not on the list. The international GP RefSet has a comprehensive list of diagnoses common in children and the College suggests that the GP RefSet is used as a point of comparison. If not, we would recommend that it is made explicit that the refset is for secondary services only.

On a more minor point, our understanding is that they are called RefSets, not 'subsets'. However, this terminology may have been a deliberate choice by the Ministry.

We hope you find our submission helpful. If you require any further information or clarification, please contact the College's policy team at policy@mzcgp.org.nz

Yours sincerely

A handwritten signature in blue ink, consisting of a large, stylized 'M' followed by a horizontal line extending to the right.

Michael Thorn
General Manager Policy