



7 October 2016

Our Ref: MT-241

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Ministry of Health
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Dear Diana,

Draft National Standards for Vaccine Storage and Transportation for Immunisation Providers

Thank you for providing the Royal New Zealand College of General Practitioners (the College) the opportunity to comment on the Draft National Standards for Vaccine Storage and Transportation for Immunisation Providers (the Standards).

Introduction to general practice and the College

General practice is the 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 Royal New Zealand College of General Practitioners (the College), is the largest medical College in the country. The College provides training and ongoing professional development for general GPs and rural hospital generalists, and sets standards for general practice. The College is committed to achieving health equity in New Zealand. To achieve health equity, we advocate for:

- A greater focus on the social determinants of health (including labour, welfare, education and housing).
- A greater focus on measures to reduce smoking and to increase healthy food options for low-income families.
- Health services that are better integrated with other community services.
- A review of the funding model for primary care to ensure that funding is targeted towards the most disadvantaged.
- Free primary health care for low-income families, because health inequities begin early and compound over the life course.

Submission

Ensuring the safety and efficacy of immunisations through excellent quality control is supported by the College.

Overall, the College notes that the revised Standards are not dissimilar to the previous guidelines but with greater specificity about requirements, and the inclusion of provisions for short term immunisation providers – most notably the Cold Chain Compliance option for those unable to achieve accreditation. The Standards are well structured and the College appreciates the use of bullet points to reduce simplify and clearly show what will be required of providers.

Cold Chain Compliance

The College supports this short-term certification option which seems a reasonable and practicable approach.

Provider Cold Chain Policy

While all practices that provide immunisation will have a cold chain management policy already, it is probable that many will need to update or add to their policies to meet the detailed policy specifications. To reduce the administrative burden it is suggested that a practice policy template is developed. In addition, because the guidance is currently very information dense, we suggest that the guidelines be accompanied by a check-list to assist practice staff with implementation.

Additionally, some flexibility is suggested in how promptly the new guidelines should be implemented. For example, it would be reasonable to expect practices to update their policy as part of their four/three yearly CORNERSTONE® / Foundation Standard reaccreditation process.

Vaccine Temperature Monitoring

It is noted that the frequency of refrigerator temperature monitoring/reviewing is increasing from at least every four weeks, to every week. There is some concern that this may be a high administrative burden with relatively severe consequence (revocation of Cold Chain Accreditation / Compliance) – particularly for smaller practices.

Overall, the college supports the revised Standards for Vaccine Storage and Transportation for Immunisation Providers.

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

Yours sincerely,

A handwritten signature in blue ink, consisting of several loops and a long horizontal stroke extending to the right.