

16 July 2026

Medical Council of New Zealand

consultation@mcnz.org.nz

Re: Consultation: Professional standards for physician associates (PAs)

Kia ora e delegate(s) of the Medical Council of New Zealand,

As a healthcare provider that represents more than 130 general practices across New Zealand, we're pleased to have the opportunity to provide feedback on the draft professional standards for PAs.

ProCare is dedicated to supporting excellence in primary care and delivering services that uplift the health and wellbeing of our communities. In Auckland and Northland, the practices we work with support more than 640,000 people. We are committed to honouring Te Tiriti o Waitangi and advancing population health and equity to improve outcomes for Māori, Pacific Peoples, and others in need.

Our feedback reflects considerations of how PAs would operate if working in general practice.

Our view of the proposal

The standards set clear expectations: "neither agree nor disagree"

We believe the standards allow appropriate flexibility for the employer and supervising doctor to determine the scope and competence of the PA. This approach suits the nature of the role, given the wide range of settings and clinical tasks that PAs may undertake across the health sector.

It is very important that PAs clearly inform patients that they are not doctors, and we would like to see this included as an explicit requirement. Patients should understand that while a PA is not a doctor, they are a regulated health professional working within an agreed scope and under appropriate supervision. It should also be clear how a patient can access review by a doctor if their condition does not improve or progresses differently than expected. Difficulties can arise where patients believe they have seen a doctor and do not seek further review when required.

The standards are workable across the range of settings in which PAs practise: "strongly agree"

The draft standards place significant reliance on employer credentialling, and we agree that this is appropriate. We believe each practice or service should determine and document the scope of practice for the PA, together with quality assurance, performance and feedback processes.

Further to our earlier comments, we find the standards relatively broad and believe this will be positive in enabling the role to adapt to different environments. This, however, places greater responsibility on supervising clinicians and employers to ensure that PAs are working safely and effectively.

In primary care, much of this feedback is likely to come through daily practice, continuity of care, and seeing the same patients over time. However, this may not apply in settings such as urgent care, where more formal quality assurance processes, such as audits, case reviews or patient feedback, may be required.

Potential risks arising from the flexibility of the draft standards

While the flexibility of the standards in their current form is supported, it may create risks such as unwarranted variation in scope of practice and deployment between services, as well as differing approaches to credentialling and supervision.

While PAs will be accountable for their own professional practice, greater clarity would be beneficial regarding the responsibilities and accountability of supervising clinicians when activities are delegated or undertaken under supervision.

Supervision capacity is limited, particularly in general practice, and further guidance on supervision requirements may be needed as the profession matures. In some settings, additional governance arrangements may also be required. Over time, this could lead to the development of nationally recognised approaches to credentialling and supervision.

Access and evaluation

ProCare supports workforce models that improve timely access to healthcare, particularly for communities experiencing barriers to primary care access.

As PAs are integrated into the New Zealand health system, consideration should be given to how their contribution affects access, patient experience, workforce sustainability and health equity. We encourage ongoing monitoring and evaluation of the impact of PAs on healthcare delivery in Aotearoa.

If you would like to talk to us about our submission, please contact Dee Crooks – General Manager of Brand and Communications at dee.crooks@procare.co.nz

Ngā mihi



Bindi Norwell

ProCare Group CEO



Dr Allan Moffitt

Clinical Director