

16 July 2026

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Tēnā koe Joan,

The Council of Medical Colleges | Te Kaunihera o Ngā Kāreti Rata o Aotearoa (CMC) is writing to provide feedback on your proposed standards for physician associates (PAs).

CMC acknowledges the Council's work in developing this consultation. While our [2025 Position on the Regulation of Physician Assistants](#) maintains that existing regulated professions could perform tasks delivered by PAs, we recognise that regulation will proceed. Our submission focuses on ensuring patient safety through robust standards that reflects the unique contexts of Aotearoa New Zealand's health system.

Before getting to the substance of our submission, we would like to raise concern about the short period of consultation provided on this important topic. Member organisations, such as CMC, do need time to seek input and advice from our members and to ensure appropriate review and approval. We would be grateful if you could provide additional time in future to ensure you obtain high-quality feedback on your proposals.

### Standards in relation to supervision

CMC was pleased with the emphasis on supervision that is present in the PA scopes of practice. Our view is that these provide for robust supervisory mechanisms that will help to ensure patient safety is protected. However, as written the standards do not reflect those expectations. While standard 2b states that a PA must "always comply with your supervision requirements", our view is that this needs to be explicitly linked to the core requirements described in the scopes of practice and which require that a PA may only work under the "employer-approved supervision of a doctor registered in a vocational scope of practice that is relevant to the practice setting and the [PA's] role" and the following requirements that deal with credentialling, Council's supervision requirements, and the supervision agreement.

### Accountability

Situations will arise where there is a risk of patient harm because either a supervising doctor does not meet his or her responsibilities, or where a PA acts outside of supervision requirements. We submit that the standards need to be clear where accountabilities lie in these situations and what, for example, a PA must do when the relationship with the supervisor and the PA breaks down, or where the PA feels unsafe with the supervision being provided.

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|---------------------------------------------------------------------|------------------------------------------------------------------------------|----------------------------------------------------------------------|--------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| Australasian College for<br>Emergency Medicine<br>(ACEM)            | College of Intensive Care<br>Medicine of Australia and<br>New Zealand (CICM) | New Zealand College of<br>Sexual and Reproductive<br>Health (NZCSRH) | Royal Australasian College<br>of Medical Administrators<br>(RACMA)             | Royal Australian and New<br>Zealand College of<br>Obstetricians and<br>Gynecologists (RANZCOG) | Royal College of<br>Pathologists of Australasia<br>(RCPA)         |
| Australasian College of<br>Sport and Exercise<br>Physicians (ACSEP) | New Zealand College of<br>Musculoskeletal Medicine<br>(NZCMM)                | Royal Australasian College<br>of Physicians (RACP)                   | Royal Australasian College<br>of Surgeons (RACS)                               | Royal Australian and New<br>Zealand College of<br>Psychiatrists (RANZCP)                       | Royal New Zealand College<br>of General Practitioners<br>(RNZCGP) |
| Australian and New Zealand<br>College of Anesthetists<br>(ANZCA)    | New Zealand College of<br>Public Health Medicine<br>(NZCPHM)                 | Royal Australasian College<br>of Dental Surgeons<br>(RACDS)          | Royal Australian and New<br>Zealand College of<br>Ophthalmologists<br>(RANZCO) | Royal Australian and New<br>Zealand College of<br>Radiologists (RANZCR)                        | Royal New Zealand College<br>of Urgent Care (RNZCUC)              |

## Collaboration

Because the PA profession is relatively new to New Zealand, we believe that strong emphasis needs to be put onto communication with colleagues and safe handover and transfer of patient care. *Good medical practice* provides strong guidance for doctors on these subjects in paragraphs 39 to 52 and in the supplementary guidance on *Transferring patients*, *Referring patients*, and *Planning for transfer of care*. We submit that these requirements should be duplicated in the standards for PAs.

## Respecting patients

At least initially, all PAs working in New Zealand will be overseas-trained. That means a high degree of emphasis is needed on ensuring that they can establish relationships of trust with New Zealand patients. This includes being aware of cultural diversity and safety, and an expectation that they function effectively and respectfully when working with and treating people of different cultural backgrounds. Again, *Good medical practice* contains some excellent guidance for doctors in these spaces, and our view is that paragraphs 14-28 and the supplementary guidance in that chapter need to be mirrored in the standards for PAs.

## Continuing professional development (CPD)

While not necessarily a matter for the standards, CMC is concerned that there do not currently appear to be any direction or guidance for PAs on their engagement in CPD. CPD is important because it helps practitioners to keep their skills current, improves performance and supports long-term development and growth. Clear expectations around how PAs engage with CPD need to be set. As our position statement notes, these expectations need to include cultural safety and cultural competency training.

Thank you for the opportunity to comment. If you have any questions or concerns, please do not hesitate to reach out to Michael Thorn at [Michael.thorn@cmc.org.nz](mailto:Michael.thorn@cmc.org.nz).

Nāku noa, nā



Dr Samantha Murton

Chair  
Council of Medical Colleges

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