

TE WAIORA



Nelson Marlborough
Health

Submission on Ministry of Health's Ethical Framework for Resource Allocation in Times of Scarcity

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Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry of Health's Ethical Framework for Resource Allocation in Times of Scarcity consultation.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

General comments

3. NMH welcomes this sound and well-written Framework that provides guidance optimising distribution and prioritisation of vital resources during the COVID-19 pandemic. NMH is pleased to see that there has been a very strong emphasis on equity in regards to resource allocation.
4. The current title of this Framework includes "...in Times of Scarcity" however, NMH contends that this is potentially misleading as the Framework looks specifically at responding to a pandemic situations. NMH recommends that the title is altered to "*Ethical Framework of Resource Allocation during times of pandemic-related scarcity*" to remove any confusion.

Specific comments

5. NMH notes that the framework uses a narrow definition of public health resources, defined by PPE, diagnostics, clinical expertise and vaccines. So far the relative success in stopping community transmission of COVID-19 and thereby not overwhelming a scarcely resourced health care system has been mostly to do with population-level interventions, good risk communication, along with the provision of informed advice to the public and timely case and contact management. The public health section of the Framework needs to be broadened so that it also encompasses these activities.
6. NMH supports the use of decision making groups at both the national and local level to apply the framework and recommend that this wider view of public health is included, particularly emphasising the importance of communication and public engagement.

Conclusion

7. NMH thanks the Ministry of Health for the opportunity to comment on the Ethical Framework for Resource Allocation in Times of Scarcity.

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized initial 'P' followed by a long, horizontal, slightly wavy line that ends in a small loop.

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