Item/Pg Number	Response
3.1.2 – Cluster Coding Page 11	The introduction of cluster coding will be a significant burden in terms of the training and education required to implement this accurately in Health Services.
	The Health Information Management / Clinical Coder workforce is known to have significant and ongoing workforce challenges across the country and in New Zealand. Most Health Services are carrying vacancies that cannot be filled as there are not enough trained and experienced staff to fill the vacancies.
	To ask struggling Health Services, to introduce more changes to coding practice, in addition to the usual changes (e.g. coding advice) will likely mean poor compliance, incorrect data and further delays in the monthly time to complete coding.
	Consideration in delaying the implementation of cluster coding is requested. Strategies need to be developed to address workforce issues before further changes are implemented.