

Nursing and Midwifery

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Anne Copeland
Chair, Nursing and Midwifery Board of Australia
C/- National Registration and Accreditation Implementation Project
PO Box 2089
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Dear Board Members,

Re: Nursing and Midwifery Consultation Papers

Thank you for providing Southern Health the opportunity to comment on the papers released by the board on 27 October 2009. Southern Health provides the following comments on:

- 1. Package as a whole**
The package as a whole provides an initial starting point for the accreditation of courses, registration of nurses and midwives and provides a framework and requirements for standards and we would support the package as a whole but provide specific feedback in the following sections for consideration.
- 2. National accreditation framework**
The National framework for the accreditation of nursing and midwifery courses leading to registration, enrollment, endorsement and authorisation in Australia should encompass comment on the provision of "work ready" graduates from accredited courses in addition to safe and competent. SH sees need for comment on refresher, re-entry and overseas registration programs and how these may sit in the framework.
- 3. Accreditation Standards – Registered Nurse**
The only accredited providers identified are universities and there are TAFE sector programs currently accredited to provide these programs. This may be an issue for current TAFE providers offering registered nurse programs.
SH believes that 800 hours clinical placement is not sufficient and would recommend that this be increased to at least 900 hours.
- 4. Accreditation Standards – Nurse Practitioner**
SH does not support the single pathway of admission criteria to masters program. A dual pathway including recognition of a Nursing Masters with additional units of study required rather than specific Nurse Practitioner would provide the opportunity to recognise the competence rather than just timeframes.

5. Accreditation Standards – Midwife

The National Health Workforce Taskforce is currently working on a maternity service core competency module which is due for completion in July 2010 and will have some differences to the current ANMC competency framework. It is SH's view that the timeframe suggested for review for current framework be within 12 months not 3 years.

SH is concerned that increasing the postgraduate diploma by 6 months to an 18 month program will impact our workforce by deterring potential students.

6. Accreditation Standards – Enrolled Nurse

SH agrees that the educational standard for enrolled nurses is at diploma level.

Clarification is required regarding the current Cert IV enrolled nurses who administer different levels of medications ie only oral/topical or oral/topical & IM/subcut or oral/topical & IM/subcut & IV as these would not be distinguishable under the proposal.

SH seeks clarification as to whether there will be a pathway for current non-medication endorsed enrolled nurses to become medications endorsed other than completing studies to a diploma level.

The 400 hour clinical placement requirement is supported by SH.

Registration standards and related matters**English language skills standard**

SH supports requirements 1, 3, 4, 5, 6 & 7 but does not support requirement 2.
SH supports exemptions 1 & 2.

Professional indemnity insurance

Requirements 3 & 4 require clarification as the wording is ambiguous and it is not clear whether nurses or midwives require additional indemnity insurance to that provided by the vicarious liability of their employer, union or educational institution.

Continuing professional development

SH would recommend that requirement for 20 hrs per year be changed to 60 hours every 3 years.

The wording around the auditing is considered vague and should be more specific in relation to the board determining timeframes around review of the audit process and the proportion of practitioners to be audited.

Recency of practice

SH supports the requirements listed for Recency of practice standard but notes that requirements 2b and 2c courses or programs are not mentioned in the accreditation framework or standards.

Requirements for nurse practitioners

SH does not support the one pathway for reasons identified in accreditation standards comment above.

Requirements for midwife practitioners

Requirement 1(b) should be reflect competency requirements and not a timeframe such as 5 years

Proposals for endorsements

SH supports the proposal for endorsement for scheduled medicines for eligible nurses and midwives.

The proposal not to endorse enrolled nurses for medications is not supported by SH as this will lead to considerable confusion for enrolled nurses in Victoria who currently may not be endorsed or have limited endorsement to administer medications.

Two national endorsements one for nurses and one for midwives for scheduled medicines is supported by SH.

Additional comments

SH would recommend the recognition Mental Health and Maternal and Child Health Nurses within the register.

It is unclear as to the status of nursing and midwifery students and SH seeks clarification regarding whether students would be registered.

SH considers it would be desirable for the proposals around the changes to the enrolled nurses requirements be introduced slowly as these have the potential for a significant impact on the enrolled nurses in the Victorian health care system.

Yours sincerely

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Executive Director of Nursing and Midwifery