

AUSTRALIAN ALLIED HEALTH LEADERSHIP FORUM

Ms Tania Voight
Executive Officer
Nursing and Midwifery Board of Australia
GPO Box 9958
MELBOURNE VIC 3001

Dear Ms Voight

Thank you for the opportunity to provide feedback on the Nursing and Midwifery Board of Australia (NMBA) proposed registration standard 'Endorsement for scheduled medicines for registered nurses prescribing in partnership'.

The Australian Allied Health Leadership Forum (AAHLF) brings together key stakeholders of the Australian allied health sector. Members include Allied Health Professions Australia, the National Allied Health Advisors and Chief Officers Committee, Indigenous Allied Health Australia, Services for Australian Rural and Remote Allied Health, and the Australian Council of Deans of Health Sciences.

AAHLF supports an endorsement for prescribing in partnership for registered nurses, as this will be a means of improving community access to care, including improved and timely access to medicines. This extension to the scope of practice for registered nurses supports the continuous development of a flexible, responsive and sustainable health workforce to enable innovation in the education of, and service delivery by, health practitioners. The following feedback is provided in response to the consultation questions.

As the endorsement for scheduled medicines relates to an individual practitioner, the governance arrangements for prescribing in partnership should also relate to the individual's practice. This could be managed through a requirement for a structured professional relationship similar to the model used by oral health therapists and dentists, rather than the governance structures of the employer organisation. Such a model would accommodate multiple partnerships and address the issue of sole practitioners or registered nurses working in their own private practice from being excluded from having an endorsement. Employer organisations would still be able to adapt existing governance frameworks to accommodate the new scope of practice for registered nurses with an endorsement. In addition, the public would retain the benefit of timely access to medicines from a private practitioner such as a registered nurse working as a credentialed diabetes educator in their own practice.

Greater clarity is required within the proposed registration standard with respect to the length of post registration experience required before an application for endorsement is submitted. It is recommended that the two years of full time equivalent experience is expressed over a timeframe similar to the recency of practice requirements (for example completion of xx hours within the past xx years) rather than as "immediately prior to the date when the complete application ... is received by the NMBA".

There is no need to specify the number of units of study for registered nurses to gain endorsement. The education for registered nurses to prescribe in partnership should be determined by the mapping of



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existing prescribing competencies against the NPS National Prescribing Competencies Framework along with the development of accreditation standards for programs of study to ensure that the competencies are achieved. In addition, any period of supervised practice should be encompassed in the program of study that will be recognised by the NMBA, rather than using a conditional endorsement process. The length of the period of supervised practice should be addressed within the accreditation standards for the approved program of study.

With respect to the structure and general content of the proposed registration standard and guideline, it would be preferable, where possible, for it to be consistent with the registration standards and guidelines for the other registered professions that have endorsement for scheduled medicines, including midwifery, optometry and podiatry.

Thank you again for the opportunity to provide feedback on this proposal. If you have any questions regarding this submission please contact myself or Ms Robyn Adams, AAHLF Secretariat, on [REDACTED]

Yours sincerely

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Catherine Turnbull

Chair

Australian Allied Health Leadership Forum

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