



19 February 2008

Ms Karen Cook
Chief Executive Officer
Australian Nursing and Midwifery Council
PO Box 873
DICKSON ACT 2602

Dear Karen

Re: ANMC National Continuing Competence Framework (Draft 2)

Thank you for your invitation to consider and offer feedback on Draft 2 of the National Continuing Competence Framework. The Australian Nursing Federation (ANF) has significant concerns about the proposed framework and the process through which it has been developed. The proposed changes to the requirements to demonstration of competence outlined in this framework represent significant changes to the requirements as they currently stand in all Australian jurisdictions.

The ANF also has concerns about the process for the project. It would be expected, given the significant impact that this framework will have on nurses and midwives, that the ANMC would have established a Project Management Committee consisting of the major nursing and midwifery stakeholders as was the case for the ANMC National Decision Making Framework Project.

The introduction of five mandatory components within the draft framework occurs in the absence of any sound evidence that this process would assure competence to practice. The Framework offers nurses and midwives no flexibility of means by which to demonstrate their continuing competence to practice. The proposed process is far more onerous than any existing nursing and midwifery regulatory requirements.

The ANF strongly supports nurses and midwives' self assessment of competence, demonstration of current practice and participation in voluntary professional development activities. Self-declaration of competence to practice following this process is and remains the most appropriate mechanism by which nurses and midwives, as educated and qualified health professionals, should renew their registration to practice.

The industrial and professional organisation for nurses and midwives in Australia

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australian nursing federation

It is proposed that the National Continuing Competence Framework should require evidence of currency of practice, evidence of relevant continuing professional development, a choice of assessment against the national competency standards (self-assessment **or** peer assessment **or** performance appraisal) and a self-declaration of competence to practice.

The ANF opposes the linking of mandatory minimum continuing professional development hours (CPD) and minimum practice hours to ongoing registration. It is of great concern to the ANF that the feedback provided to the ANMC through the state and territory forums conducted during October and November 2007 is not accurately reflected in Draft 2 of the Framework. Concerns expressed by participants in relation to the implications of mandatory minimum CPD hours and minimum practice hour requirements for individual nurses and midwives and subsequently the profession have been ignored.

The introduction of the framework as it is currently proposed would potentially have far reaching implications for the nursing and midwifery workforce. The consequences of the prohibitive requirements for mandatory minimum CPD and practice hours may be that nurses and midwives elect not to renew their registration despite their competence to do so.

Please find enclosed copies of the ANF policy on continuing professional education and position statement on continuing competence. The Australian Nursing Federation's response to the National Continuing Competence Framework has been addressed using the feedback form provided by ANMC which accompanies this letter.

Should you have any questions in relation to the feedback provided please contact me on (02)6232 6533 or via email at fedsec@anf.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Jill Iliffe".

JILL ILIFFE
Federal Secretary

encl.

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