

AUSTRALIAN PEAK NURSING and MIDWIFERY FORUM



18 December 2008

Bronwyn Nardi
Chair
Practitioner Regulation Subcommittee
of the Health Workforce Principal Committee

Email: nraip@dhs.vic.gov.au

Dear Ms Nardi

**Re: *Submission to Consultation Paper Proposed Arrangements for Accreditation
6 November 2008***

The Australian Peak Nursing and Midwifery Forum (APNMF) is a coalition of the peak nursing and midwifery organisations in Australia which exists to work collaboratively on issues of national importance to nursing and midwifery. The APNMF identifies areas of common interest and concern relating to nursing and midwifery and attempts to work towards a position of consensus. The APNMF also takes joint action in areas of importance to nursing and midwifery and develops joint position statements which provide directions for government and other stakeholders.

The APNMF is comprised of the:

- Australian Nursing and Midwifery Council;
- Council of Aboriginal and Torres Strait Islander Nurses;
- Australian Nursing Federation;
- Royal College of Nursing, Australia;
- Council of Deans of Nursing and Midwifery; and
- Australian College of Midwives.

We refer to your paper of 6 November 2008 inviting comments on the Consultation Paper *Proposed Arrangements for Accreditation*.

The commitment of nursing and midwifery to national regulation is based on ensuring the protection of the public and on maintaining the highest standards of nursing and midwifery care to the Australian community through designing a system which supports health professionals. This includes a commitment to taking the time necessary to ensure the scheme

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developed is best practice in terms of protection of the public and is implemented carefully, thoughtfully and transparently.

The APNMF has discussed the paper in detail and provides the following comments for your consideration. Please note the numbering used in this submission reflects that of the consultation paper.

2. CURRENT ACCREDITATION ARRANGEMENTS

As noted in the consultation paper at present accreditation of nursing and midwifery courses is conducted by the state and territory Nursing and Midwifery Regulatory Authorities (NMRAs) in accordance with state based legislation. As the NRAS project team is aware nursing and midwifery have expressed a preference to utilise the committee structure outlined in clauses 1.38 and 1.39 of the IGA for accreditation of courses under the national scheme. The APNMF proposes, however, there must be not one but two committees that would each report to the Board - one committee for nursing and one for midwifery.

The nursing and midwifery professions, through the Australian Nursing and Midwifery Council (ANMC) have already developed a national framework for the accreditation of courses leading to registration, enrolment, endorsement and authorisation in Australia. The framework, which establishes the processes for the accreditation of courses and the principles underpinning these processes, was completed in 2007. In a related project, ANMC is currently developing the national standards and criteria for these courses. This project is due for completion in early 2009. The accreditation framework is available at:

http://www.anmc.org.au/professional_standards/index.php. The framework will be updated in line with the National Accreditation process.

2.1 Assessment of internationally qualified nurses and midwives for registration

The NMRAs are also responsible, under their individual legislation, for the assessment of internationally qualified nurses and midwives for registration. The Australian Nursing and Midwifery Council (ANMC) is the peak body of the NMRAs established in 1992 to lead a national approach with the NMRAs in evolving standards for statutory regulation of nursing and midwifery. In addition to completing work on national standards on behalf of the NMRAs, the ANMC is also responsible for the skills assessment of internationally qualified nurses and midwives for migration. This aspect of the ANMC's work is completed in its capacity as an Assessing Authority for the Department of Immigration and Citizenship (DIAC). In assessing internationally qualified nurses and midwives for registration and migration the ANMC and the NMRAs work together to develop and implement consistent standards for both processes. Nurses and midwives who obtain registration from an NMRA without a skills assessment from the ANMC are still entitled to apply to DIAC for permanent migration.

Nursing and midwifery are of the view that, under the national registration and accreditation scheme, the assessment of internationally qualified nurses and midwives for both migration and registration could be completed by the state and territory offices overseen by the state and territory committees reporting to the national Board. Such assessment would be undertaken in accordance with the principles and processes set down by the national Nursing and Midwifery Board. This preference is primarily based on resourcing factors. In the financial year 2007-2008 approximately 7,000 internationally qualified nurses and midwives were granted registration in Australia by the NMRAs. This contrasts with 2,500 who applied to the

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ANMC for assessment. Therefore the majority of staff with expertise are already currently employed at the state/territory level by the NMRAs and the volume of applicants is such that assessment of all applicants at the national level would require development of additional infrastructure at significant cost.

Funding for both the NMRAs and the ANMC for the assessment of internationally qualified nurses and midwives for registration and migration is derived from applicants' fees.

2.2 Accreditation of courses

Funding for accreditation of courses by the NMRAs is derived from a mix of registrants' fees and fees charged to education providers for that accreditation. The NMRAs do not currently receive any government funding for accreditation of courses. In addition a great deal of the work completed in the accreditation of courses is provided by experts engaged by the NMRAs on a pro bono basis.

As with the assessment of internationally qualified nurses and midwives for registration the majority of staff with expertise in the area of accreditation are currently employed directly by the NMRAs. In previous submissions the APNMF has called for the retention of appropriate expertise at both the national and state/ territory offices. This is a critical issue for nursing and midwifery in terms of accreditation of courses and assessment of the qualifications of internationally qualified nurses and midwives. To successfully transition to national accreditation of courses those staff currently employed for this work in the NMRAs will need to be employed in the national, state and territory offices under the new scheme in order to ensure maintenance of standards and quality and prevent a loss of essential corporate knowledge.

3. PROPOSED NEW ACCREDITATION ARRANGEMENTS

3.1 Key features of proposed system

The APNMF supports the purpose of accreditation outlined in the paper; however, as previously stated it is our view that assessment of internationally qualified nurses and midwives should be completed by appropriately qualified staff employed by the national board and located in the state and territory offices. There has been a continued emphasis both nationally and internationally on the need for uniform standards of assessment for nurses and midwives whilst ensuring that all potential applicants to Australia are treated in an equitable, transparent manner. However, with over 200 countries to consider and limited human and financial resources it is impossible to keep abreast of changes in other countries and therefore develop contemporary policies in a timely fashion. For this reason the APNMF supports a competency based assessment of the qualifications of individual nurses and midwives as the primary method of assessment supported by assessments of overseas accrediting authorities to determine whether the courses they accredit provide the required knowledge and skills to practice in Australia.

3.2 Roles in relation to accreditation

The APNMF agrees the Ministerial Council has no role in the accreditation of courses; and the National Board should approve the accreditation standards.

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3.4 Scope of accreditation

As detailed in the consultation paper the scope, complexity and workload of accreditation depends on a number of factors.

Size of the profession – currently in Australia there are in excess of 250,000 nurses and 15,000 midwives on the NMRAs registers. As previously stated some 7,000 internationally qualified nurses and midwives obtained registration in the last financial year and this is a number which is increasing. There are currently approximately 330 courses and 124 providers accredited by the NMRAs.

These accredited courses which lead to registration, enrolment, endorsement or authorisation include;

- Bachelor of Nursing
- Graduate entry Masters of Nursing
- Bachelor of Midwifery
- Post Graduate Diploma of Midwifery
- Masters in Midwifery
- Masters of Nurse Practitioner
- Combined degrees (eg. Bachelor of Nursing/Bachelor of Midwifery, Bachelor of Nursing/Bachelor of Education)
- Certificate IV in Enrolled Nursing
- Diploma of Enrolled Nursing
- Medication administration for Enrolled Nurses
- Re-entry programs
- Bridging programs

These numbers reinforce the assertion of the APNMF that national accreditation of courses should be completed using the staff currently employed by the NMRAs working in accordance with the national standards and processes as determined by the Nursing and Midwifery Board.

Recognition of specialties and accreditation of specialist training

Proposal 3.4.1:

As previously stated in our submission on registration arrangements the APNMF supports enabling legislation which allows for specialist registration where this is defensible from the perspective of protection of the public. We note also that this is an issue to be dealt with under transition arrangements as there are currently significant differences between the various jurisdictions in terms of specialist endorsement.

Proposal 3.4.2:

The APNMF has no view on this proposal.

Proposal 3.4.3:

APNMF is of the view that the approval of new specialties or specialty areas of practice, like the development of professional and accreditation standards, should be the responsibility of the national boards. Please refer to the Australian Peak Nursing and Midwifery Forum (APNMF) response to the consultation paper on issues supplementary to the Intergovernmental agreement on a national registration and accreditation scheme for the

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health professions to be included in the first bill, 5 September 2008, response under section 5.11 in respect of the boards retaining responsibility for the development of professional standards, accreditation of courses 'or related professional issues'.

Core accreditation functions

Proposal 3.4.4:

The APNMF supports the accreditation committees' functions in terms of courses; however as has previously been stated it is our view that assessment of internationally qualified nurses and midwives is a function best completed by staff of the state and territory offices under delegation from the national board.

Proposal 3.4.5:

The APNMF strongly supports this enabling proposal.

Proposal 3.4.6:

As previously stated the APNMF view is that the National Board should have the authority for approval of standards for accreditation of courses.

Proposal 3.4.7:

The APNMF supports this proposal.

3.5 Governance arrangements for external accreditation bodies

Proposal 3.5.1: – 3.5.8:

The APNMF supports these proposals and commends the emphasis on consultation which is employed in the development of all its standards. This is reflected in the ANMC approach to the project to develop the course accreditation standards criteria and evidence which is guided by a steering committee representing key stakeholder groups. This committee has just completed a formal open two month consultation period for the draft standards, whereby the standards were available on the ANMC website and circulated to stakeholder groups directly.

Under 3.5.2 (e) we would add quality improvement activities.

3.6 Accreditation committees

The APNMF supports the establishment of accreditation committees and the processes for appointments to those committees as detailed in section 1.26 of the Intergovernmental Agreement. Provision should also be made for the training and education of committee members around their roles and responsibilities in terms of the legislation. The APNMF would prefer they be called 'Councils'. The rationale for calling the nursing and midwifery accreditation committees 'Councils' in preference to 'Committees' is that this is congruent with other professions, reflects the decision-making role of the bodies and would prevent confusion with the state and territory committees.

APNMF insists that two 'councils' are required; a National Nursing Accreditation Council and a National Midwifery Accreditation Council. This will be essential to ensure there is appropriate expertise and input to the determination of standards for courses leading to entry to practice as a nurse or midwife.

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Proposal 3.6.1:

The APNMF supports this proposal as a legislated minimum. The final composition would be a matter for the National Board to decide, however, the APNMF would recommend the composition of the two accreditation councils should be as follows:

National Nursing Accreditation Council

The National Nursing Accreditation Council should consist of 11 members comprised of:

- A minimum of three nurses;
- Three non nurses including:
 - a consumer;
 - a midwife from the National Midwifery Accreditation Council; and
 - another health professional from another national accreditation council;
- Two board members from the National Nursing and Midwifery Board (one of whom must be a registered nurse);
- Three members with education experience as follows:
 - 2 nominees of the Council of Deans Nursing and Midwifery (CDNM); and
 - 1 nurse from VET sector when enrolled nursing courses are being accredited.

At all times at least one member of the Council should have Aboriginal and Torres Strait Islander background.

The Chair is to be a nurse elected by members of the Council and this appointment is to be signed off by the National Board.

The Council should have the capacity to co-opt individuals with appropriate expertise as necessary.

National Midwifery Accreditation Council

The National Midwifery Accreditation Council should consist of 11 members comprised of:

- Three midwives (including one from the service sector with expertise in clinical midwifery education);
- Three non midwives comprised of:
 - two consumers of midwifery care; and
 - a nurse from the National Nursing Accreditation Council;
- Two board members of the National Nursing and Midwifery Board (one of whom must be a midwife); and
- Three midwives with expertise in tertiary education of midwives for entry to practice – at least one of whom should be nominated by the CDNM.

At all times at least one member of the Council should have Aboriginal and Torres Strait Islander background.

The Chair is to be a midwife elected by the members of the Council and this appointment is to be signed off by the National Board.

The Council should have the capacity to co-opt individual members with appropriate expertise as necessary.

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Proposal 3.6.2:

The APNMF prefers the Chair be elected by the Council members by a process approved by the national board.

Proposal 3.6.3:

The APNMF supports this proposal.

Proposal 3.6.4:

The APNMF supports this proposal.

3.7 Linkages

Nursing and midwifery are strongly of the view that both registration and accreditation are integral functions of the national board and our proposal for utilisation of a Nursing and a Midwifery Council rather than external bodies for accreditation is reflective of that philosophy.

Proposal 3.7.1:

The APNMF supports the proposal that an appeal process should be identified and available, with the following proviso, that an appeal should be granted only where discrepancies of processes have occurred. This is in accord with the process for 'review of process' established under the ANMC 2007 Accreditation Framework, section 5.12, p. 18.

The requirement in the proposal for an 'external process of review' needs to be clarified and the term 'external' defined before APNMF is able to provide constructive feedback on this part of the proposal.

3.8 Indemnity

Proposal 3.8.1:

The APNMF supports this proposal.

3.9 Funding arrangements

APNMF, as stated in previous submissions, is resolute in its opinion that the National Board has access to and control over sufficient and suitable financial and human resources to allow it to regulate nursing and midwifery appropriately.

3.10 Accreditation Process

APNMF has concerns with some of the proposals in this section and with the discussion under section 5 of the consultation paper on international linkages. APNMF takes the view that national standards need to be developed for the national context and take into account a range of issues, including degree structures, funding arrangements, models of determining competence, together with international standards of practice. They cannot be determined wholly by international trends, especially where the models of competence, degree structures and funding arrangements are not comparable.

Australia needs standards to produce graduates who are safe and competent to practice at an international standard, but this may be different from meeting the requirements for registration to practise in another country as defined by the other country's standards for accreditation. While Australia should be aware of the accreditation standards in other

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countries in developing our own, it ought not be limited by the standards of other countries where it feels best practice or national considerations dictate different standards. This point of view underpins the responses provided for the relevant proposals.

Proposal 3.10.1:

- (a) The APNMF requests the ANMC Accreditation Framework, discussed above, be added to the documents outlining accreditation processes for the agency to consider. The ANMC framework is available at: http://www.anmc.org.au/professional_standards/index.php
- (b) APNMF is concerned about the demand to 'meet' any relevant international guidelines and would prefer language that emphasises the need to be aware of international guidelines and best practice while reserving the right to develop standards that consider the needs and circumstances of the Australian context.
- (c) Corresponding to the response to 3.10.1 b), APNMF is concerned about the use of the term 'align' in this proposal and would prefer language that emphasises the need to be aware of international guidelines and best practice while reserving the right to develop standards that consider the needs and circumstances of the Australian context. Where international standards are used, APNMF supports the appropriate identification of these.
- (d) The APNMF supports this proposal.

Proposal 3.10.2:

The APNMF supports this proposal and proposes the addition of a requirement for mid-term reporting and auditing and that the final report be made publicly available. APNMF also supports reporting any changes that are relevant to the accreditation status of the course as soon as possible. If a major change is planned, notification should be consistent with the negotiated timetable given for full accreditation, though a shortened period may be agreed. Attention must be given to indicating how the necessary graduate outcomes will be met in the changed circumstances. This is in accord with the processes for 'reporting during the accreditation period' established under the ANMC 2007 Accreditation Framework, section 5.14, p. 18.

4 Linkages with Commonwealth, State and Territory government bodies

Proposal 4.1:

The APNMF supports this proposal.

5 International linkages

Proposal 5.1:

The ANMC has existing Memoranda of Understanding with both the New Zealand Nurses' Council and the New Zealand Midwives' Council and consults with both bodies in the development of standards. The APNMF does not see the need for this to be legislated given that the National Agency will be developing business processes for development of standards.

The APNMF is resolute that any Mutual Recognition Agreement signed by Australia will not result in a lowering of regulatory standards in Australia.

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6. Transitional arrangements

Proposal 6.1:

The APNMF supports these proposals. In relation to (c) the APNMF recommends a maximum period of 3 years.

In relation to (d) the APNMF recommends that a provision for less than a one year period be included to allow for extenuating circumstances whereby the public interest requirements to amend an accreditation standard or standards outweighs the individual students or education providers rights and ensure the identified issue is addressed forthwith. This may be subject to Ministerial Advisory Council approval.

Thank you for taking the time to read our proposals in preparation for further discussions.

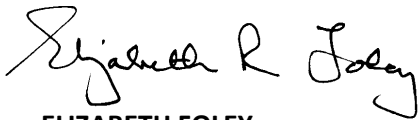
Yours sincerely



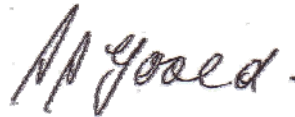
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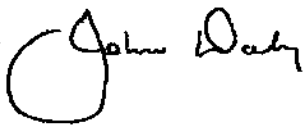
LEE THOMAS
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Australian Nursing Federation



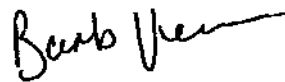
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