

Australian Nursing and Midwifery Federation submission

**Australian Nursing and
Midwifery Accreditation Council
public consultation for the
Registered Nurse Prescribing
Accreditation Standards**

15 December 2023



Australian
Nursing &
Midwifery
Federation



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INTRODUCTION

The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 320,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

The ANMF, on behalf of our members, has a genuine interest in, and concern for, matters relating to the education of our professions. We have made significant contribution, and continue to do so, to a range of committees and working groups at national and jurisdictional levels, involved with the design, accreditation and evaluation of education programs for nurses and midwives.

For decades, registered nurses and midwives have engaged in structured prescribing through the use of nurse and midwife-initiated medicines, standing orders and protocols. Current Bachelor of Nursing, Bachelor of Midwifery and Postgraduate Diploma of Midwifery programs provide the underpinning education required to enable registered nurses and midwives to safely administer and prescribe medicines through the use of nurse and midwife-initiated medicines, standing orders and protocols.

Nurse practitioners and midwives with scheduled medicines endorsement have consistently demonstrated their ability to safely prescribe independently. Designated prescribing by registered nurses is the missing piece for the professions' role in safe medicines prescribing. This expanded model of supplementary prescribing, working alongside independent prescribers, has immense potential to improve timely access to high quality, safe health care and quality use of medicines.



The ANMF appreciates the opportunity to provide feedback to the Australian Nursing and Midwifery Accreditation Council (ANMAC) for the public consultation on the draft *Registered Nurse Prescribing Accreditation Standards*.

The ANMF offers the following feedback in response to the consultation questions.

CONSULTATION QUESTIONS

1. This response is on behalf of

- an organisation
- an individual

2. Please enter the organisation name if responding on behalf of an organization

The Australian Nursing and Midwifery Federation (ANMF)

3. Full name

Lori-Anne Sharp, ANMF Federal Assistant Secretary

4. Phone number

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5. Email address

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6. Please select one of the following, so we can share your feedback via our website

- This is a public submission that can be loaded onto the ANMAC website
- This a private submission that cannot be loaded onto the ANMAC website.

7. Which of the following role options best describes your perspective when responding

- Consumer
- Registered nurse
- Nurse educator/facilitator/lecturer/teacher
- Nurse Practitioner
- Student nurse
- Early career registered nurse
- Health care professional other than a registered nurse (please specify profession in the text box below)
- Health service manager



- ✓ Nominated organisational representative (please specify organisation in the text box below)
- Nurse researcher
- Other

The Australian Nursing and Midwifery Federation (ANMF)

8. Which of the following options best identifies your primary work location

- Australian Capital Territory
- New South Wales (metro)
- New South Wales (regional or remote)
- Northern Territory
- Queensland (metro)
- Queensland (regional or remote)
- South Australia (metro)
- South Australia (regional or remote)
- Tasmania
- Victoria (metro)
- Victoria (regional or remote)
- Western Australia (metro)
- Western Australia (regional or remote)
- ✓ National

9. Criterion 2.2 and 2.3 currently provide an opportunity for an interdisciplinary approach to the governance and/or delivery of a Registered Nurse designated prescribing program.

Do you support the proposed governance requirements outlined within Criteria 2.2 and 2.3?

Proposed 2.2 The governance structure for the provider and the school conducting the program ensures academic oversight of the program and promotes high-quality teaching and learning experiences for students to enable graduate competence.

Proposed 2.3 Relevant input to the design and ongoing management of the program is provided by active consultation and collaboration with representatives from:

- a) the Nursing School, who are registered nurses with the NMBA, without conditions on their registration relating to conduct, and holding relevant qualifications and experience
- b) the nursing profession, including endorsed Nurse Practitioners and RN prescribers
- c) external community representatives including consumers, students, Aboriginal and/or Torres Strait Islander peoples and other relevant stakeholders.

- Yes
- ✓ No



10. Please provide a reason for your response to question 9

Although, an interdisciplinary approach to the governance and delivery of a registered nurse designated prescribing program is supported, it should be the nursing school within the university that leads governance for these programs, in conjunction with the delivery of other nursing programs. Proposed criterion 2.2 should stipulate that the governance structure for the provider is a school of nursing within a university offering and delivering accredited courses leading to registration as a registered nurse. The school of nursing responsible for the program should ensure academic oversight of the program and promote high quality teaching and learning experiences for students to enable graduate competence. The wording of proposed criterion 2.3 should be amended to ensure that responsibility for, not just relevant input to, the design and ongoing management of the program rests with the university through the school of nursing and the relevant registered nurses. Schools of nursing, who are currently accredited and approved to offer pre-registration registered nurse programs, must have control over development and delivery of registered nurse designated prescribing programs. The active consultation and collaboration should be with practitioners from other relevant health profession disciplines such as pharmacy, midwifery and medicine and external community representatives, not the other way around.

11. Criterion 3.3 currently outlines key program content and subject learning outcomes for a Registered Nurse designated prescribing program.

Do the proposed standards, particularly the requirements outlined in criterion 3.3, focus sufficiently on the content and learning outcomes for designated registered nurses to safely prescribe scheduled medicines in accordance with a prescribing agreement with an authorised health practitioner?

Proposed 3.3 Program content and subject learning outcomes ensures:

- a) achievement of competencies described in the NPS: National Prescribing Competency Framework
- b) preparation of students to prescribe scheduled medicines
- c) legal / medicolegal principles and relevant legislative frameworks that enable designated RN prescribing in each state and territory
- d) understanding of ethical and professional obligations of prescribing within the scope of designated RN prescribing practice
- e) an opportunity for students to demonstrate an integrated approach to prescribing
- f) an understanding of the designated RN prescribing model
- g) knowledge of relevant medicine funding models in Australia
- h) a prescribing practice learning plan.



- Yes
- No

12. Please provide a reason for your response to question 11.

The program content and subject learning outcomes detailed in proposed criterion 3.3 comprehensively covers the necessary requirements for designated registered nurses to safely prescribe scheduled medicines in accordance with a prescribing agreement with an authorised health practitioner. The prescribing competencies framework is robust and postgraduate prescribing programs developed based on this framework would ensure prescribers are knowledgeable about quality use of medicines and hold relevant knowledge around pathophysiology and the functions of medicines to enable safe prescribing. As this is a new model of prescribing, it may be useful to also include program content and subject learning outcomes that ensure strategies to address local governance requirements and system challenges or changes are addressed.

13. Are there any other issues, gaps, omissions, duplications or errors in version 2 of the proposed standards that you wish to comment on?

- Yes
- No

14. Please provide a reason for your response to question 13.

Appendix E point 1.6 requires education providers to have processes in place to manage students with identified impairments that, in the course of professional experience placement (PEP), may place the public at risk. Points 1.4 and 1.5 both refer to PEP with a proposal from previous consultations to remove these criteria as PEP is not a requirement of the program of study. It seems like an anomaly to still refer to the need to refer students with impairment when on PEP if PEP is not required.

CONCLUSION

Thank you for this opportunity to provide feedback to the public consultation on the draft *Registered Nurse Prescribing Accreditation Standards*. The ANMF strongly supports the development of these new standards, designed, delivered and led by schools of nursing in universities approved and accredited to offer programs of study leading to registration as a registered nurse, and looks forward to the introduction of this important initiative to improve access to and quality use of medicines for people in Australia.