Australian Nursing and Midwifery Federation submission

Increasing access to health and aged care: a strategic plan for the nurse practitioner workforce (the Plan)

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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 represent, 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 welcomes the opportunity to provide a response to the Australian Government Department of Health and Aged Care consultation on a strategic plan for the nurse practitioner workforce.

The ANMF has been a lead organisation in the conception and development of the nurse practitioner role in Australia. Most of the 2,447¹ nurse practitioners in this country are ANMF members. We are a staunch advocate for this peak clinical role for registered nurses, which is integral to improving access for people to evidence-based, safe and effective health and aged care. There remains much to be done to ensure there is a substantial increase in the numbers of registered nurses electing to undertake the pathway to nurse practitioner endorsement. The strategic plan is an important first step to seriously growing the nurse practitioner workforce but to achieve this the set of actions in the plan must be bold, ambitious, measurable, sustainable and appropriately funded.

Member representation, feedback, collective knowledge and experience, places the ANMF in a prime position to make clear recommendations to assist the development and implementation of a strategic plan for the nurse practitioner workforce.

¹ Nursing and Midwifery Board of Australia. (2022). Registrant Data – Reporting period: 01 July 2022 to 30 September 2022. Available at: https://www.nursingmidwiferyboard.gov.au/About/Statistics.aspx



SURVEY QUESTIONS

Aim and Outcomes of the Plan

1.	Do you think the aim of the plan is clear?
	Very clear✓ Somewhat clearUnclearUnsurePrefer not to say
2.	Are the targeted outcomes of the Plan appropriate for the next 10 years?
	☐ Very clear ✓ Somewhat clear ☐ Unclear ☐ Unsure ☐ Prefer not to say

3. Please provide any additional feedback or comments on the aims and outcomes.

The case for action and a strategic plan is clear and compelling. Although it is useful to consider the contexts of practice where nurse practitioners are currently working with attention on unmet need, it is important to recognise that there is much to be gained from growing the nurse practitioner workforce in all contexts of practice. The aim of the Plan should be to enhance the accessibility and delivery of person-centred care for all people in Australia, not just Australians, through a well-distributed, culturally safe nurse practitioner workforce. The Plan should include pathways and funding mechanisms to support remote health care provided by nurse practitioners using telehealth or other emerging technologies.

As this is a strategic plan for the nurse practitioner workforce, the outcomes should be clear, concise and explicit for nurse practitioners. The Plan should ensure that opportunities are created to provide jobs for nurse practitioners to work to their full scope of practice in order to seriously address the underemployment of endorsed nurse practitioners. The ANMF is acutely aware that many of our nurse practitioner members are not able to practice as nurse practitioners in public sector health services, due to:

- 1. No or, where they exist, very few allocated funding streams for nurse practitioner roles;
- 2. Limited funding for nurse practitioner Master's degree education;
- 3. Lack of organisational policies to support nurse practitioner practice within individual health services;



- 4. Medial dominance over roles or aspects of care that are within the scope of nurse practitioner practice; and
- 5. Endorsed nurse practitioners having no option but to take up other registered nurse roles that are not at the same level or remuneration as a nurse practitioner including:
 - a. Clinical Nurse Consultant;
 - b. Clinical Nurse Manager;
 - c. Case/Care Manager;
 - d. Clinical Nurse Specialist; and
 - e. Research Officer.

The outcomes should be amended to state:

Outcome 1: People will have access to NP services in all settings across the country.

Outcome 2: People will be informed to choose appropriate NP services.

Outcome 3: The health and aged care system will enable NPs to work to their full scope of practice.

Outcome 4: NPs will practice in a culturally safe way and reflect the diversity of the communities they care for.

Education Lifelong Learning Questions

4.		Will these actions support the nurse practitioner workforce to enhance their skills and pability to address population health needs?
	_	Yes
		No Unsure
		Prefer not to say
	_	Fieler flot to say
5.	1.2	Will these actions encourage provision and uptake of nurse practitioner education and
	the	e nurse practitioner pathway, including encourage the growth of First Nations nurse
	pra	actitioners?
		Yes
		No
	✓	Unsure
		Prefer not to say



6. Please provide any additional feedback or comments on the actions under Education and Lifelong Learning.

The actions under Education and Lifelong Learning should be clear, concise, explicit and measurable. This will allow for appropriate monitoring and evaluation of the Plan to determine whether the outcomes have been met. Rather than 'identifying opportunities to...' or 'exploring', the Plan should state the specific actions required.

For example:

- Action 1.1.1 Incentivise employers to provide integrated professional advanced practice hours required for NP endorsement.
- Action 1.1.2 Financially support NP candidates with targeted scholarships, FEE-HELP relief and an annual capped number of Commonwealth Supported Places.
- Action 1.1.3 Fund professional development of NPs.
- Action 1.1.4 Establish and fund NP communities of practice.
- Action 1.2.1 Provide 500 annual scholarships for NP candidates to undertake Master of Nurse Practitioner programs, where evidence demonstrates NP workforce need.
- Action 1.2.2 Reserve 20 annual funded Master of Nurse Practitioner places for First Nations NP candidates.
- Action 1.2.3 Develop a training pipeline with incentives, scholarships, mentoring and employment for First Nations nurses to become NPs.

Recruitment and Retention Questions

	✓ No □ Unsure
	☐ Prefer not to say
_	Disconnected and additional feedback an environment on the cottons and a Decomb

8. Please provide any additional feedback or comments on the actions under Recruitment and Retention.

The outlined actions to facilitate recruitment and retention of nurse practitioners are broad and vague. Reviewing funding arrangements and exploring the establishment of a roadmap for funding reforms will not, in and of itself, improve the financial sustainability of nurse practitioner services or reduce financial barriers. It isn't possible to strengthen or sharpen incentives when there are currently none.



Actually introducing incentives to facilitate recruitment and retention is essential. The Plan should detail what and how much these incentives should be. The long term action should be more than 'encouraging Primary Health Networks to support NP models of care'. All Primary Health Networks should be required to commission NP-led models. It is not clear how providing a program to support nurse practitioners changing or expanding their scope of practice will improve retention. Creating jobs for nurse practitioners is however a good place to start.

Models of Care Questions

9.			actions needs?	facilitate	sustainable	models	of	nurse	practitioner	care	that	meet
	✓	Unsure	ot to say									
10				nsure nati ope of pra		ency of pi	racti	ice and	l enable nurs	e prac	tition	ers to
	- ✓	Unsure	ot to say									
11	. Ple	ase pro	vide anv	additional	feedback or	commen	ts o	n the a	ctions under	Mode	els of	Care.

The actions detailed are broad, circular and vague. Once again, this set of actions should be clearly articulated, concise, measurable and sustainable. They should be direct and explicit, specifying exactly what needs to be done in the short, medium and long term.

The ANMF agrees that for national consistency of practice, inappropriate jurisdictional variations and limitations on prescribing and scope of practice need to be removed. National regulation ensures that all nurse practitioners meet the Nursing and Midwifery Board of Australia's *Nurse practitioner standards* for practice². As is the case for general practitioners, nurse practitioners have individual scopes of practice in accordance with their education, competence and authorisation. Our members tell us that the constant jurisdictional and local checking procedures and restrictions are onerous, exhausting and entirely unnecessary. They undermine the advanced practice, autonomous nature of the nurse practitioner role and are not imposed on other health practitioner colleagues.

² Nursing and Midwifery Board of Australia. (2021). *Nurse practitioner standards for practice*. Available at: https://www.nursingmidwiferyboard.gov.au/Codes-Guidelines-Statements/Professional-standards/nurse-practitionerstandards-of-practice.aspx



Actions that would enable nurse practitioners to work to their full scope of practice under Medicare include, but are not limited to:

- Enabling people to access MBS rebates for long-term and primary care management provided by nurse practitioners;
- Improving access to MBS-subsidised nurse practitioner services in aged care settings;
- Enabling nurse practitioners to request home and residential medication management reviews;
- Significantly increasing the schedule fee assigned to current MBS nurse practitioner time-limited professional attendance items;
- Introducing a new MBS item for longer nurse practitioner attendances (lasting at least 60 minutes)
 to support the delivery of complex and comprehensive care;
- MBS rebates for after-hours or emergency care provided by nurse practitioners;
- MBS rebates for nurse practitioner care received outside of a clinic setting (residential or in-home care);
- Removal of the requirement for nurse practitioners to form collaborative arrangements with medical practitioners;
- Removal of current restrictions on diagnostic imaging investigations;
- MBS rebates for procedures performed by nurse practitioners; and
- Enabling nurse practitioners to refer to other health practitioners and health professionals³.

Health Workforce Planning Questions

12.	Will these actions build understanding of the role and contribution of nurse practitioners for
	consumers, professional and employers?
	 Yes No ✓ Unsure Prefer not to say

³ Medicare Benefits Schedule Review Taskforce. (2019). Post Consultation Report from the Nurse Practitioners Reference Group. Available at: https://www.health.gov.au/resources/publications/final-report-from-the-nurse-practitioner-reference-group



13. Will these actions bolster data infrastructure and planning processes that include nurse practitioners in health workforce planning?

	Yes

☐ No

✓ Unsure

Prefer not to say

14. Please provide any additional feedback or comments on the actions under Health Workforce Planning.

More than an awareness strategy to support the plan, there needs to be a funded national campaign to build understanding of the role and contribution of nurse practitioners and to mainstream the nurse practitioner role into health service planning and provision. Further detail of exactly what would be included in a campaign should be listed in the actions.

Rather than supporting a regular and nationally consistent nurse practitioner data collection strategy, the actions should be to collect and publish annual data on nurse practitioners and nurse practitioner candidates. National nurse practitioner modelling is supported and should be made publicly available in a timely way to allow for workforce planning.

Additional Feedback/Comments

15. If you have any additional feedback/comments on the Consultation Draft of the Plan, please provide below.

Incorporation of a Monitoring and Evaluation Framework (MEF) is supported but its success will be contingent on a clear, concise, specific, measurable Plan.

The appendices providing the evidence for actions and an outline of nurse practitioner regulation and standards for practice in Australia are excellent. The clear, descriptive overview provided in the evidence for actions appendix needs to be translated into direct, explicit actions that can be taken to address the four identified themes in the Plan – education and lifelong learning; recruitment and retention; models of care; and workforce planning.

As a short term action, the ANMF recommends that the arbitrary requisite 5000 hours of clinical advanced nursing practice within the past 6 years to achieve nurse practitioner endorsement be reviewed. Members often have considerable experience outside of this timeframe which rigid application of this requirement fails to acknowledge. This is a systemic barrier to career progression as a nurse practitioner.



Participant Information Questions

Pa	rτιc	pant information Questions
16	. Na	me: Annie Butler, ANMF Federal Secretary
17	. Ple	ease select your current location
	_ 	Urban Regional Rural Remote Very Remote National
18	. Wr	nich best describes your response?
		I am responding as an individual
	✓	I am responding on behalf of an organisation/institution
19	. If y	ou selected that you are responding as an individual, please select all that best describes u:
20	Oth	Consumer Nurse practitioner Nurse practitioner candidate Nurse practitioner employer Registered nurse Enrolled nurse Medical practitioner Allied health professional Policy officer/analyst Academic/researcher ner (please specify): You selected that you are responding as an organisation, please select the category that as the describes your organisation:
		Peak/professional body – nursing and midwifery Peak/professional body - medicine Peak/professional body - other Regulatory body Aboriginal and/or Torres Strait Islander organisation



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		State/Territory Government department/agency
		Health service delivery organisation
		Local council
		Primary Health Network
		University/education/research institute
	Oth	ner (please specify):
21		you consent to being named as having provided a submission to this consultation ocess?
	✓	Yes
		No
22		you consent to your submission being published on the Department of Health and Aged re Consultation Hub?
	✓	Yes – including my name and submission
		Yes – de-identified submission
		No

CONCLUSION

Thank you for this opportunity to provide feedback on the draft strategic plan for the nurse practitioner workforce. The Plan presents the opportunity to establish clear, concise, explicit outcomes and actions to grow the nurse practitioner workforce, develop sustainable models of care and allow nurse practitioners to work to their full scope of practice for the benefit of people in Australia. However, the proposed Plan needs substantial amendment to capitalise on this opportunity and achieve this aim. Serious Government commitment to realise a clear, funded Plan for significant growth of the nurse practitioner workforce is long overdue. The ANMF looks forward to working with Government to make the Plan a meaningful reality.