Australian Nursing and Midwifery Federation submission

AUSTRALIAN NURSING AND MIDWIFERY ACCREDITATION COUNCIL CONSULTATION FOR THE REVIEW OF THE RE-ENTRY TO THE REGISTER REGISTERED NURSE ACCREDITATION STANDARDS

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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 300,000 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.

On behalf of our large and growing membership, the ANMF has genuine professional and industrial interest in, and concern for, matters relating to the regulation, education and practice of our professions. The ANMF has made significant contribution, and continues to do so, to a range of committees and working groups at national and jurisdictional levels that relate to the design, accreditation and evaluation of education programs for nurses and midwives.

The ANMF appreciates the opportunity to provide a response to the public consultation by the Australian Nursing and Midwifery Accreditation Council (ANMAC) for the review of the *Re-entry to the Register Registered Nurse Accreditation Standards*. This review will enable ANMAC to provide accreditation standards for education providers to meet that will ensure their approved program will prepare previously registered nurses to demonstrate the safe, contemporary practice necessary to re-enter the Register.

The ANMF has a critical interest in accreditation standards that ensure registered nurses are educated and qualified for safe, competent and ethical practice and meet the Nursing and Midwifery Board of Australia's (NMBA) *Registered nurse standards for practice*. It is essential that there are NMBA approved re-entry programs available for previously registered nurses following a lapse in practice of between 5 to 10 years to enable them to return to the profession should they choose. Well- constructed programs incorporating well-supported, quality, professional experience placement (PEP) is critical to optimising student's success in the program. This is necessary in order to assist in attracting them back to the profession, and to retaining them as part of our future workforce.

The ANMF are concerned that the changes for Internationally Qualified Nurses and Midwives (IQNM) to an Outcomes Based Assessment (OBA) approach will reduce program viability for education providers offering bridging and re-entry programs concurrently. IQNM's have been the largest cohort in these combined programs. With small numbers of re-entry students, education providers will most likely cease to offer the programs. It is essential that education providers already offering an entry to practice registered nurse program are encouraged, and even incentivised, to provide the *Re-entry to practice Registered Nurse Accreditation Standards* (RTP-RN) program. This may be in the form of a significant reduction to, or waiving of, the fee incurred for accreditation of a program whose length is under 6 months in order to assist education providers financially and encourage applications.

The proposed name change to *Re-entry to practice Registered Nurse Accreditation Standards* (RTP-RN) to align them with the ANMAC *Registered Nurse Accreditation Standards* and the NMBA's return to practice policy is supported.

CONSULTATION QUESTIONS

1. **Do the proposed accreditation standards enable education providers to design and deliver a program of study that ensures graduates, seeking to return to practice have the required knowledge, skills and attitudes to meet the NMBA registered nurse standards for practice? Please provide an explanation for your answer.**

   The alignment of the revised RTP-RN Accreditation Standards with the current ANMAC *Registered Nurse Accreditation Standards* ensures consistency of content and promotes safe, evidenced-based clinical practice for all students, whether they are entering or re-entering the Register.

   Standard 5 – Student Assessment: criteria 5.2 and 5.5, specifically link learning outcomes, assessments and demonstration of competence, to the NMBA *Registered nurse standards for practice*, thereby providing students with a clear understanding of the standards they are required to meet for professional practice.

   The wording in the proposed Standard 3 – Program of Study: criteria 3.2 is slightly confusing to the reader. The ANMF propose that criteria 3.2 be amended to clearly articulate that:

   > *The program of study must meet the Australian Qualifications Framework (AQF) requirements for a minimum level 7 award program, with program content set at a similar level of complexity and expertise as a Bachelor Degree. Successful completion of the program will result in a statement of completion and/or attainment by the governing Australian university or higher education provider, not the award of a Degree.*

   An amendment to the wording of Standard 3, criteria 3.12, to detail the range of PEP hours as a minimum of 80 to a <u>maximum</u> of 240 hours, exclusive of simulation activities, would also provide greater clarity.

2. **Should any criteria be added? Please identify and provide an explanation for your answer.**

   The proposed revised standards are comprehensive, detailed and align with the ANMAC *Registered Nurse Accreditation Standards*. As detailed above, Standard 3 criteria 3.2 and 3.12 should be amended to read more clearly.

   Further, we recommend the requirement that a registered nurse must undertake PEP assessment, articulated in Standard 1 – Safety of the Public, criteria 1.4, should also be included in Standard 5: Student Assessment.

3.   **Should any criteria be removed? Please identify and provide an explanation for your answer.**

No. All content within the revised standards is relevant.

4.   **Are the proposed professional experience placement hours sufficient to ensure competence to return to practice as a registered nurse?**

The ANMF supports the proposed range of a minimum of 80 to a maximum of 240 PEP hours for approved re-entry programs. The flexibility to offer a range of PEP hours allows education providers to tailor PEP to individual students learning requirements. This will take into account that students require different durations of PEP to demonstrate that they meet the NMBA *Registered nurse standards for practice*. Allowing re-entry students to complete PEP over a shorter period, where appropriate, also eases the personal and financial burden they encounter returning to study.

5.   **Please provide any other feedback about the structure and/or content of the proposed standards.**

As these proposed revised RTP-RN Accreditation Standards differ from the ANMAC *Registered Nurse Accreditation Standards 2019*, the ANMF recommends that a separate evidence guide for these standards be developed. This resource will assist education providers to demonstrate that they meet the revised standards.

The evidence guide could provide examples to encourage education providers to use the existing content of their entry to practice for registered nurse programs to prepare previously registered nurses for practice and to demonstrate that they are meeting the accreditation standards.

CONCLUSION

Thank you for the opportunity to participate in the public consultation for the ANMAC review of the *Re-entry to the Register Registered Nurse Accreditation Standards*, on behalf of our membership.

As the largest professional and industrial body for nurses in Australia, the ANMF has a substantial interest in registered nurse education as it directly relates to a viable nursing workforce. These ANMAC accredited and NMBA approved education programs must enable previously registered nurses, seeking to re-enter the Register, to meet the NMBA *Registered nurse standards for practice*. These programs should prepare these previously registered nurses for safe and competent practice through attainable requirements that reflect contemporary, evidence-based nursing practice.