



30 January 2014

Ms Amanda Adrian,  
CEO, ANMAC  
GPO Box 400  
Canberra City, ACT 2601

Dear Amanda,

**Re: Accreditation Standards for Re-entry to the Register – Registered Nurse 2013 Final consultation**

The Australian Nursing and Midwifery Federation (ANMF) is pleased for the opportunity to make the following comments on the *Accreditation Standards for Re-entry to the Register – Registered Nurse 2013 Final consultation*.

The Federation represents in excess of 230,000 members and has a strong interest in the development of accreditation standards for programs leading to registration that find a balance between protection of the public and being fair, equitable and transparent for registered nurses.

**Preamble**

We note the considerable work and broad consultation conducted in the development of these Standards.

The ANMF concurs with the guiding principle:

*to promote an increase in the availability of accredited programs and to ensure a more flexible and cost effective pathway for applicants seeking re-entry to practice following a lapse in registration from five to 10 years. (Final Consultation paper, 16 December 2013, p. 2)*

As we have stated in previous submissions on this subject, the ANMF holds the view that skilled and experienced nurses with sound, current practice ability may be disadvantaged by restricting re-entry to a period of less than ten years. The NMBA policy which has an absolute determination on a ten year or greater absence from the register requiring completion of an undergraduate nursing qualification is entirely unacceptable. A shortage of nurses into the future can only be addressed through broad and innovative approaches, and further consultation to develop pathways for such applicants must be considered.

The ANMF agrees there will be private providers who may not be able to, or may not care to, meet requirements to become or to partner with higher education providers to deliver re-entry programs. The introduction of this Standard may prove to be a valuable self-selection process ensuring only those private providers who are innovative, forward thinking and dedicated to providing quality education in nursing will succeed in meeting the requirements or forming partnerships.

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The ANMF understands the anticipated benefits of the proposed approach outlined in the Consultation paper:

- Removal of unregulated providers;
- Improvements in quality of education provided;
- Consistency for employers in the outcomes of programs; and
- Potential to gain a recognised qualification

As there has been no information provided on projected costs to students undertaking re-entry programs, we reserve our opinion on “value for money” for individuals.

### The Standards

It is fit and proper that the Re-entry Accreditation Standards are embedded in the Registered Nurse Accreditation Standards 2012 and/or the Accreditation Standards for Entry Programs for internationally Qualified – Registered Nurse (EPIQ). The ANMF recognises the nine draft Accreditation Standards for Re-entry represent the culmination of a lengthy process of development. The draft Standards reflect requirements to provide a sound education program.

### Application and Accreditation

A more detailed explanation is required of the two different pathways by which applicants may return to the Register. The pathways may be logical to those who have participated in the process of the development of these Standards. Consultation with our Branches reveals that people who have not been involved in the process express confusion over applying the Accreditation Standards for EPIQ to programs for individuals seeking domestic re-entry.

The ANMF appreciates the opportunity to provide comment on the ANMAC draft Accreditation Standards. Should you require any further information, please contact Julianne Bryce, ANMF Senior Federal Professional Officer by telephone: (03) 9602 8520, 0409 221 699 or email: [julianne@anmf.org.au](mailto:julianne@anmf.org.au).

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lee Thomas'.

**Lee Thomas**  
Federal Secretary

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