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## Submission to the Nursing and Midwifery Board of Australia on the Nurse Practitioner Endorsement Registration Standard and Guidelines

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## 1. Introduction

The Australian Nursing Federation (ANF) was established in 1924. The ANF is the largest professional and industrial organisation in Australia for nurses and midwives, with Branches in each State and Territory of Australia.

The core business for the ANF is the professional and industrial representation of our members and the professions of nursing and midwifery.

With a membership of over 196,000 nurses and midwives, members are employed in a wide range of enterprises in urban, rural and remote locations in both the public and private health and aged care sectors.

The ANF participates in the development of policy relating to: nursing and midwifery practice, professionalism, regulation, education, training, workforce, and socio-economic welfare; health and aged care, community services, veterans' affairs, occupational health and safety, industrial relations, social justice, human rights, immigration, foreign affairs and law reform.

The ANF is pleased to provide comment to the Nursing and Midwifery Board of Australia (NMBA) regarding the revised nurse practitioner endorsement registration standard and proposed guidelines. The ANF, in consultation with the State and Territory Branches, has considered these draft documents with specific feedback detailed below.

## 2. Registration standard: Endorsement as a nurse practitioner

### Requirements

Point b) of the requirements to be eligible for endorsement as a nurse practitioner states that the nurse must be able to demonstrate 'advanced nursing practice'. The definition provided in the Standard is for 'advanced practice nursing' not 'advanced nursing practice'. One of these terms describes a level of practice and the other describes the level at which an individual nurse is practising. For clarity of the requirement there should be consistent use of terminology in the document. As the requirements apply to an individual nurse then the consistent term to be used in the Standard should be 'advanced nursing practice'. A definition of this term should be included in the Standard.

In relation to point d), the ANF requests that the NMBA acknowledge prior undertakings of jurisdictions to recognise the qualifications of current nurse practitioner candidates. In some cases these qualifications do not mirror the NMBA requirements in the revised Registration standard: Endorsement as a nurse practitioner. These commitments to current candidates should still be honoured.

ANF believes that in addition to recognition of formal qualifications at masters level, consideration should be given to candidates that can demonstrate equivalence.

In point e) of the requirements to be eligible for endorsement as a nurse practitioner, the nurse must demonstrate 'an extra ten hours of participation in continuing professional development (CPD) per year in addition to the 20 hours of participation required each year for general registration. This requirement should be consistent with the wording in the NMBA CPD Registration Standard which stipulates that registered nurses who hold endorsement as nurse practitioners under the National Law must complete at least 10 hours per year in education related to their endorsement. Specifying that those additional 10 hours of CPD per year must include prescribing, diagnostic investigations, consultation and referral is a limited view of the nurse practitioner role and scope of practice. Not all nurse practitioners undertake these activities.

The wording in section e) should be amended to:

e) an extra ten (10) hours of participation in continuing professional development (CPD) per year in addition to the 20 hours of participation required each year for general registration (that is, 30 hours in total of CPD each year). This CPD must be relevant to a nurse practitioner's scope of practice in education related to their endorsement. It is recommended that, where appropriate, the additional CPD addresses: prescribing and administration of medicines; judicious use of diagnostic investigations; and consultation and referral, where the nurse practitioner has authority to prescribe and order diagnostic investigations.

## Definitions

In the definition of nurse practitioner there is a typographical error in the second sentence. It should state '...authorised to function autonomously and collaboratively in an advanced and extended clinical role.' The reference provided for this definition should be abbreviated as for the definitions provided for advanced practice and competency standards, not listed in full. It should state (ANMC, 2006).

## References

The two references provided are incorrectly presented and incomplete. They should state:

Australian Nursing and Midwifery Council. (2006). *National Competency Standards for the Nurse Practitioner*, ANMC, Canberra.

Nursing and Midwifery Board of Australia. (2010). *Guidelines: Endorsement as a nurse practitioner*, NMBA, Melbourne.

## 3. Guidelines: Endorsement as a nurse practitioner

### Introduction

Paragraph 3 in the introduction states that 'This *Registration standard* describes the requisite skills, knowledge and experience required for endorsement as a nurse practitioner.' The Standard describes the requisite qualification and experience. It doesn't describe the 'requisite skills and knowledge'.

In the listing of the parties for whom the Guidelines have been developed to provide direction and information, dot point 4 should state employers of nurse practitioners or employers of health practitioners.

The footnote for this section should be amended to delete 'as enacted in participating jurisdictions' as the National Law is now enacted in all states and territories.

### Application for endorsement as a nurse practitioner

Dot point 5 of the listed requirements that an applicant seeking endorsement as a nurse practitioner must be able to demonstrate relates to CPD. Reference to 'specified CPD' should be removed. This dot point should be amended to:

- an extra 10 hours of participation in continuing professional development (CPD) per year in addition to the 20 hours of participation required each year for general registration (that is, 30 hours in total of CPD each year). This CPD must be relevant to a nurse practitioner's scope of practice demonstrated in the undertaking of education related to their endorsement.

### Table 1 – Model for endorsement as a nurse practitioner

Requirement 1 (general registration) – Details section (remove the 's' from nurses), should read as:

1. an applicant who has not had general registration as a registered nurse in Australia previously and is applying for initial registration in the general category of nurse as a registered nurse.

Requirement 2 (advanced nursing practice) – Details section, definition should be of advanced nursing practice not advanced practice nursing (see explanation above in point 2 of submission). How do nurses prove that they have been undertaking advanced nursing practice?

Requirement 5 (CPD) – Details section (should be consistent with the wording in the NMBA CPD Registration Standard), should read as:

This additional CPD participation must be relevant to the scope of practice of the nurse practitioner. It is recommended that, where appropriate, the additional CPD addresses:

1. prescribing and administration of medicines
2. judicious use of diagnostics investigations and
3. consultation and referral where the nurse practitioner has authority to prescribe and order diagnostic investigations.

### Requirements for continuing recognition as a nurse practitioner

This section should also include professional indemnity insurance arrangements in addition to CPD and recency of practice, as one of the requirements for annual renewal of registration.

Continuing professional development section – paragraph 3 should be amended to remove reference to 'specified' CPD and should be consistent with the wording in the NMBA CPD Registration Standard which requires that the additional CPD be related to the endorsement. Wording in this paragraph should read as:

Nurse practitioners are required to undertake an additional 10 hours of CPD per year, in addition to the 20 hours of CPD required for general registration. This CPD must be relevant to a nurse practitioner's scope of practice demonstrated in the undertaking of education related to their endorsement. It is recommended that, where appropriate, the additional CPD addresses: prescribing and administration of medicines; judicious use of diagnostics investigations; and consultation and referral where the nurse practitioner has authority to prescribe and order diagnostic investigations.

### Safety and quality framework

Is this section of the document the actual Safety and Quality Framework (SQF) or is it referring to a separate document developed by the NMBA. If this is a separate document, where is this available? A reference for the NMBA SQF for Nurse Practitioners should be included.

The elements of the SQF should be listed after the first paragraph, before the explanation of the action to be taken by the NMBA if a nurse practitioner fails to comply.

### Code of professional conduct and ethics

Referencing for this section needs to be completed. This sentence should be amended to read as:

The Board has approved and adopted the *Code of Professional Conduct for Nurses in Australia* (ANMC, 2008; adopted NMBA, 2010) and the *Code of Ethics for Nurses in Australia* (ANMC, RCNA and ANF, 2008; adopted NMBA, 2010) as a component of the Professional Practice Framework (PPF) with which nurse practitioners must comply.

### National competency standards

The reference in this section is incorrect. The date listed for this reference is 2005 and should be amended to 2006.

### Mandatory reporting

For consistency with the NMBA guideline, this section should be titled 'Mandatory notifications'. The final sentence in this section should state:

The Board's *Guideline on mandatory notifications* is available on the Board's website at [www.nursingmidwiferyboard.gov.au](http://www.nursingmidwiferyboard.gov.au) under *Codes and guidelines*.

The NMBA *Guideline for mandatory notifications* should be included in the references.

### Endorsement as a nurse practitioner does not give automatic access to the MBS and PBS

This heading should be amended to 'Access to the MBS and PBS'. The heading should then be the first sentence in this section. The first paragraph of this section should read as:

Endorsement as a nurse practitioner does not give automatic access to the MBS and PBS. The nurse practitioner must be approved as a participating nurse practitioner by applying for a prescriber and/or provider number to Medicare Australia. The discretion to authorise access to the MBS and PBS remains with Medicare Australia. The process of authorisation through Medicare is a process additional to endorsement by the Board to practise as a nurse practitioner.

Clarification is sought as to the meaning of 'a process managed by agencies other than the Board' at the end of the last sentence in the first paragraph in this section.

### Prescribing authority and compliance with state or territory legislation

The second paragraph in this section should be amended to read as:

It is outside the Board's jurisdiction to specify a distinct formulary of medicines for the area of practice of each nurse practitioner. The prescribing requirements are properly related to a nurse practitioner's employment conditions and the relevant legislation relating to medicines within each jurisdiction. Failure of a nurse practitioner to practise and prescribe within this scope of practice will result in investigation by the Board.

### Collaborative arrangements

The reference to the date of the *National Competency Standards for the Nurse Practitioner* in the first sentence of this section is incorrect. The date listed for this reference is 2005 and should be amended to 2006.

## References

The *Health Insurance Act 1973* is not referred to in these guidelines and should not be included as a reference. There is a typographical error in the title of the *National Competency Standards for the Nurse Practitioner* which states 'nursing' instead of 'nurse'. A reference is included for the *NMBA Guidelines for Continuing Professional Development*. Where is this document available? This document is also referred to and referenced in the NMBA CPD Registration Standard but is not available on the NMBA website. In the reference for the Registration Standard for endorsement as a nurse practitioner the title is incorrect. It should read as:

Nursing and Midwifery Board of Australia (2010). *Registration standard: Endorsement as a nurse practitioner*, NMBA, Melbourne.

The references should also include the NMBA Continuing professional development registration standard and the NMBA Guidelines for mandatory notifications.

## 4. Conclusion

The Australian Nursing Federation appreciates the opportunity to provide advice to the Nursing and Midwifery Board of Australia in relation to the revised nurse practitioner endorsement registration standard and proposed guidelines. These guidelines, once completed, will be an important resource for nurse practitioners, nurses and midwives, the community, health professionals and other relevant stakeholders. In particular, additional work needs to be undertaken to clarify the requirements for advanced nursing practice and continuing professional development.

We look forward to continued participation in ongoing consultations with the NMBA to develop and approve standards and guidelines to provide direction to registered nurses and midwives.