Kathleen Almond
NMBA
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November 25, 2010

Dear Ms Almond,

**Re: NMBA revised draft Nurse Practitioner Endorsement Registration Standard and newly developed Guidelines.**

The Australian College of Mental Health Nurses (ACMHN) is the professional body for mental health nurses. Among our membership are Mental Health Nurse Practitioners and many mental health nurses who may consider becoming nurse practitioners in the future.

The ACMHN believes nurse practitioners will become vital to addressing workforce shortages in Australia. To maintain public confidence in these nurses, it is important that the proposed standards and guidelines achieve a balance between streamlining the process to become a nurse practitioner and ensuring the safety and quality of health care to consumers. We believe the standards, with the amendments suggested will achieve this balance.

The ACMHN convened an expert reference group of Nurse Practitioners to review the draft standard and guidelines. We are happy to provide you with the following feedback:

**Requirement a): Current general registration as a registered nurse with no restrictions on practice.**

**Comment:** Mental health nurses who have a single certificate in mental health / psychiatric nursing and whose practice is therefore restricted to working within mental health settings, will be excluded from endorsement by this requirement.

There are many mental health nurses who completed their education and training prior to the introduction of comprehensive nursing degrees or who have completed their nursing education overseas in jurisdictions that offer direct entry mental health nursing. These nurses meet the core competencies of a registered nurse with the qualification that they apply them within the area of mental health. There are
many such nurses who are working at an advanced practice level and should be encouraged to become nurse practitioners within the area of mental health.

There are no safety or quality issues that would arise from allowing these nurses to be endorsed as nurse practitioners as long as all other criteria are met. If this is not allowed, it would impose a severe restriction on the supply of mental health nurse practitioners in Australia.

**Recommendation:** The ACMHN recommends that the guideline be amended as follows:

‘An applicant who is currently registered with the Board in the general category of ‘registered nurse’ and whose registration does not have any conditions or restrictions imposed on his or her practice has satisfied this requirement. Single certificate mental health nurses who are currently registered with the Board in the general category of ‘registered nurse’ and whose registration does not have any conditions or restrictions imposed on his or her practice, other than that he or she practice within an area relevant to mental health, have satisfied this requirement’.

**Requirement b):** Advanced nursing practice that constitutes the equivalent of three (3) years’ full-time experience within the past five (5) years.

**Comment:** The ACMHN supports this requirement with no further amendment.

**Requirement c) compliance with the competency standards for nurse practitioners approved by the NMBA**

The ACMHN supports the requirement. However, it is noted that as part of national accreditation, all universities conducting approved NP degrees would be required to address and assess compliance with competency standards for nurse practitioners throughout the program. As such, it seems redundant that nurses with board approved nurse practitioner-specific masters degrees would need to further demonstrate their compliance with the competency standards as part of their endorsement applications.

However, where the applicant who has applied for endorsement does not have an approved NP degree but is applying under an equivalence pathway, quite clearly, competence against the NMBA Competency Standards for Nurse Practitioners would need to be demonstrated.
Recommendation: The ACMHN recommends that the application process delineate two pathways and that applicants who already have an approved NP qualification are not required to further demonstrate their compliance with the NP competency standards.

The ACMHN expert reference group further noted that under the previous State-based system, there was a lack of transparency about the process associated with evaluating compliance with competency standards and the criteria that are used in this process.

Recommendation: The ACMHN recommends that assessment processes and criteria against which compliance with the competency standards (for those applicants applying under an equivalency pathway) be established with appropriate consultation and involvement of stakeholders.

Requirement d): Completion of the requisite qualification or equivalent as determined by the Board

The ACMHN agrees that applicants should be able to apply for endorsement as an NP under an equivalence pathway. However, this is a complex process which requires considerable attention.

It is important that nurses from overseas who hold equivalent nurse practitioner qualifications be eligible to apply for endorsement here in Australia.

Board approved NP courses are grounded in a nursing framework, addressing nursing practices and theories; they then extend to a specialist focus on the area of clinical expertise (e.g. mental health). In order to demonstrate equivalence therefore, these two aspects would need to be considered in tandem.

The ACMHN recommends that a transparent process be established, in consultation with stakeholders. Clear guidelines will need to be developed that ensure all nurses who apply for endorsement as a NP utilizing the equivalence pathway, are able to demonstrate not only expertise in their clinical specialty (e.g. mental health), but that they demonstrate nursing expertise equivalent to that which would be provided in a NMBA accredited NP masters program.

Again, how this is to be demonstrated, the criteria against which it will be evaluated and a transparent understanding of who will be assessing the applications will be vital to ensure confidence in the process.
Requirement e): an extra ten (10) hours of participation in specified 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 and must include prescribing and administration of medicines, judicious use of diagnostic investigations and consultation and referral where a nurse practitioner has authority to prescribe and order diagnostic interventions.

Comment: The ACMHN supports this requirement with no further amendment.

Additional General Comments:

The ACMHN expert reference group noted that the process is more streamlined than the previous State-based systems.

The ACMHN identified that the make-up of evaluation panels, assessment and evaluation criteria and processes associated with equivalence and assessment of applications must be transparent and accessible to all applicants.

Please do not hesitate to contact me should you require any additional information.

Yours sincerely,

Adj Assoc Prof Kim Ryan
Chief Executive Officer ACMHN