

13 February 2009

Practitioner Regulation Subcommittee  
[nraip@dhs.vic.gov.au](mailto:nraip@dhs.vic.gov.au)

Dear Sir / Madam

The Nurses and Midwives Board of New South Wales (NSW) provides the following comments on the "Further Consultation Paper - Proposed arrangements for specialists within the National Registration and Accreditation Scheme for the Health Professions".

There are two general concerns that the Nurses and Midwives Board of NSW has, which are:

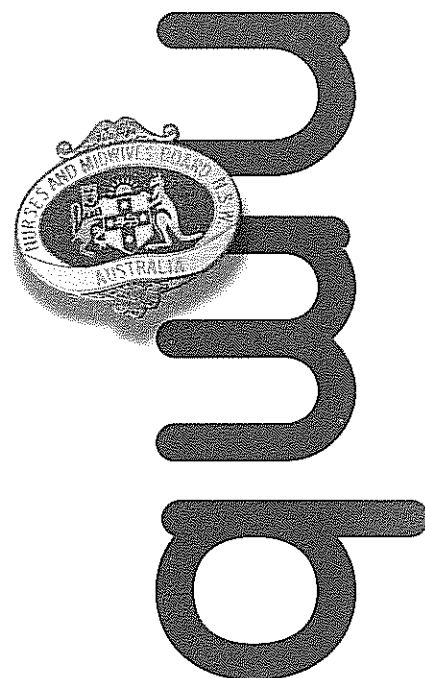
- the need to ensure that all persons entitled to practise prior to the commencement of the national scheme being able to continue to practise after 1 July 2010; specifically the transition arrangements for the endorsement of Nurse Practitioners and the arrangements that will permit Enrolled Nurses (Mothercraft) to continue to practise; and
- confirmation that persons currently registered and enrolled will be able to continue to practise, with the same entitlement to practise that exists prior to 2010, without reassessment of their qualifications for example:
  - a nurse whose education in Australia satisfied the requirements for registration in one jurisdiction of Australia, e.g. mental retardation nursing or general nursing certificate qualification which led to registration;
  - a nurse from another country who has satisfied registration requirements in an Australian jurisdiction.

The following specific comments on the "additions and amendments" proposed for the paper are provided for consideration.

#### Specialist endorsement

Point a. is agreed

Point b. is agreed



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Point c. is agreed, and as commented above, with the request that clarification be provided as to how enrolled nurses in NSW on List B of the Roll "Mothercraft nurses" will be recognised under the new legislation. This may be by specialist endorsement and/or conditions on practice, or by another manner.

Point d. is agreed

Point e. is agreed

#### Continuing competence requirements

Points f, g, h are agreed

#### Registration of specialists (including area of need specialists)

Point i. is not agreed.

Registration for "area of need" (whether a geographic area or an area of clinical practice) should not allow a lowering of standards for registration. There may be scope to register practitioners with conditions where this protects the safety of the public and be applied in all locations, not just in a specific "area of need".

#### Scope of practice

Point j. is strongly supported

Matters proposed by one board which affect the scope of practice of practitioners in another jurisdiction must be required to consult with all other boards and in submitting for Ministerial approval, draw to the attention of the Ministerial Council any contrary views, e.g.:

- Medical board and Nursing and Midwifery board, issues such as obstetrics and midwifery or psychologists and mental health nurses.
- Podiatry board and the Nursing and Midwifery board, issues such as foot care;

that is, such issues for Ministerial approval should be for the protection of the public and not for the protection of "professional turf".

Yours faithfully



Michael Cleary  
Executive Director