

Consultation Secretariat  
Nursing and Midwifery Board of Australia  
Australian Health Practitioner Regulation Agency

Dear NMBA

**APHA response to the public consultation paper: proposed registration standard**

Thank you for the opportunity to make a submission to the Nursing and Midwifery Board of Australia (NMBA) public consultation on the proposed registration standard: endorsement for scheduled medicines for registered nurses prescribing in partnership.

The Australian Private Hospitals Association (APHA) agrees registered nurses in rural and isolated practice should be able to hold an endorsement to prescribed scheduled medicines. The rationale for rural and remote practice is sound and is therefore supported.

The APHA does not, however, believe a blanket extension of this endorsement to registered nurses who are not located in regional or remote areas is necessary. In your consultation paper, the rationale for registered nurses to be able to prescribe in partnership includes this section:

[Registered nurses] endorsed to prescribe in partnership will be functioning as a member of a team e.g. within an acute or aged care setting, within a general practice, community health or as a remote area nurse where teams are co-located or geographically dispersed. (Page 8)

This statement acknowledges registered nurses will be part of a team and work in partnership with medical practitioners, which negates the need for registered nurses to be able to prescribe. Even in instances of geographic dispersion of the workforce, telephone orders could be provided.

Further, under the requirements for endorsement, it is stated the registered nurse should have no conditions or undertakings relating to unsatisfactory professional performance or unprofessional conduct. This should include any condition relating to Impairment.

The current requirement of two years' equivalent of post initial registration is insufficient, and should be increased to five years. The APHA also believes supervised practice should be required, and should be six months full time equivalent.

The APHA would welcome the opportunity to discuss further the issues raised in this submission.

Yours sincerely

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**CHIEF EXECUTIVE OFFICER**  
**Australian Private Hospitals Association**  
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