

Ms Jackie Doolan
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Australian Nursing and Midwifery Accreditation Council
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Dear Ms Doolan

Re: ACN submission on the *Review of the Enrolled Nurse Accreditation Standards First Consultation Paper 2015*

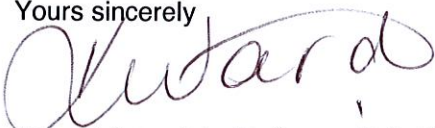
In response to an invitation received from the Australian Nursing and Midwifery Accreditation Council, Australian College of Nursing (ACN) welcomes the opportunity to provide comment on the *Review of the Enrolled Nurse Accreditation Standards First Consultation Paper 2015*.

ACN supports the review of the accreditation standards for Enrolled Nurses in the context of national health policy developments and given the significant role enrolled nurses have in providing care across Australia's health and aged care systems.

ACN's submission on the draft Standards is attached. It is noted that we have only few concerns with the modifications proposed and generally applaud ANMAC on the development of a consistent approach to education across all levels of nursing.

Please do not hesitate to contact me for further information or discussion on this matter.

Yours sincerely



Adjunct Associate Professor Kylie Ward FACN
Chief Executive Officer

26 November 2015

ACN submission on the *Review of the Enrolled Nurse Accreditation Standards First Consultation Paper 2015*

Regarding the draft Standards, ACN has concerns about four of the modifications currently proposed.

Standard 3 Program development and structure

Standard 3.6 A minimum of 400 hours of workplace experience, not inclusive of simulation activities, incorporated into the program.

ACN agrees with the proposed minimum of 400 hours of workplace experience, not inclusive of simulation activities, be incorporated into the program.

A caveat on this agreement is that ACN supports the completion of a suitable and varied level practice that covers the breadth and diversity of the role that a beginning EN may undertake. The exact break-up and emphasis of this practice as well as overall minimum hours should be determined by contemporary educational research about practice education and nursing skill acquisition. Given the length of the current programs of education to become an EN any practice component must also be reflective of the need for high quality theoretical content and the recognition that this must go hand in hand with any practical learning experience.

EN's must complete quality education in nursing practice in their course. The expectation is 10-12 weeks of varied practice including AM, PM and perhaps weekend and night shifts. ACN is of the view that the practice program must be tailored to ensure EN students learn to apply their skills set amongst the range of healthcare professionals. EN students should be placed within a team that facilitates their best development, application of skill and supervision in a realistic workplace environment with patients of diverse demographic and care needs.

These criteria for practical skill acquisition do not diminish the requirement of academic competence.

Standard 4: Program Content

ACN has no broad comments to make about this standard overall and is generally in agreement except as outlined below.

Of particular concern to ACN in this standard is the inclusion of **4.4.C.** which suggests that program content for Enrolled Nurses should facilitate the development of research appreciation and translation skills. ACN is of the view that such content is beyond the scope of this level of training as research appreciation and translation requires an understanding of research methodology. In turn the inclusion of such content appears to be inconsistent with level in the Australian Qualifications Framework.

Likewise, an overview of the current curriculum content of Bachelor of Nursing courses in Australia is indicative that research appreciation and translation skills is typically not covered until the second or even third full-time year of study. Consequently, the desire for the inclusion of such content in Enrolled Nurse programs of study presents another inconsistency. While ACN appreciates the need to strive for a higher

standard of education for nurses overall this standard needs to be developed in such a manner that does not place unrealistic expectations on students and graduates.

Standard 6: Students

ACN has no broad comments about this standard and is generally in agreement with the content except has noted below.

Standard 6.3 Students have met the NMBA English language proficiency and demonstrate communication skills to be able to successfully undertake academic and workplace experience requirements throughout the program.

ACN is in support of this draft standard and the proposed modification to ensure that students have met the NMBA English language proficiency and demonstrate communications skills as outlined prior to commencing a program.

There is a clear view within nursing that the expectations of English language proficiency should be raised to better support safety and quality in the delivery of nursing services. While ACN recognizes and supports the need for greater systems flexibility, we are of the firm view that any policy changes to language testing must be cautiously adopted particularly as the evidence base for change in language testing remains inconclusive in some areas.

ACN notes our concerns about the consistency and effectiveness of the current English language testing methods in appropriately reflecting a person's English competencies for purposes required in health care and aged care settings. ACN's concerns are based both on anecdotal evidence and experiences of nurses working with individuals who do not speak English as a first language as well expert opinion. Our informants claim there are nurses who have passed endorsed language testing methods, but whose levels of English language skills do not meet communication requirements, particularly in clinical settings.

Previously research commissioned by the NMBA identified the scarcity of conclusive evidence regarding the validity the IELTS and OETS as effective English language measures for health professionals. It his however essential that the professions and the public can have a high degree of confidence in the rigour and validity of the English language tests being used to confirm the language competencies of health professionals.

It should be noted that English language testing is a highly specialized field and that tests such as IELTS and OET are essentially normative tests that do not have pass marks. These tests reflect the capacity to understand and communicate compared to the wider English speaking population internationally rather that test a person's language ability or suitability to function in any particular capacity or occupation.

Given the complex and time-consuming processes involved in language testing and assessment the profession needs to determine a test score that is deemed acceptable for practice. The NMBA has currently determined that an overall score of at IELTS score of at least 7.0 is appropriate.

It is ACN's view that this score should be met before entry to any course of Enrolled Nurse training and that potential students must meet this prior to their enrolment in the preferred course of study. This would avoid student enrolments and entry into courses where students have little hope of succeeding because of insufficient language skills.

Enrolled nurse education providers should therefore focus on the best practice assessment of the broad communication skills necessary to practice nursing. Any focus on more specific testing of English language skills is likely to lead to inconsistencies across providers.

Standard 7: Resources

ACN is generally supportive of the the modifications within the Standard except as noted below.

7.11 Given that most Australian vocational education providers and their staff do not typically receive federal research funding as a component of their core function consideration needs to be given as to whether it is feasible for providers to meet this provision. Consideration in particular needs to be given as to what is expected in scholarship and/or research/or generation new knowledge and how staff might be alternatively able to demonstrate this in ways other than grants, publications and conference papers.

References

Australian Qualifications Framework Council (2013), *Australian Qualifications Framework, Second Edition January 2013*.