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Dear Ms Jackson

ACN submission on the draft *Entry Programs for Internationally Qualified Registered Nurses Accreditation Standards 2013*

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 draft *Entry Programs for Internationally Qualified Registered Nurses Accreditation Standards 2013* (the draft Standards).

ACN supports the development of national standards for entry programs for internationally qualified registered nurses (EPIQ-RNs) in the context of recent national health policy developments and given the significant role international nurses have in providing care across Australia's health systems. ACN's comments on the Accreditation Standards reflect our extensive experience as a provider of high-quality courses for internationally qualified RNs. Over the past decade, ACN has provided 128 courses for internationally qualified RNs seeking registration in Australia, which have been attended by more than 2,000 students. ACN EPIQ-RN courses are highly regarded by students, the Nursing and Midwifery Board of Australia (NMBA) and employers.

Regarding the draft Standards, ACN has significant concern about three of the modifications currently proposed.

In relation to **Standard 1.1**, ACN does not support allowing non-higher education providers to deliver EPIQ-RNs, even in cases where they have governance arrangements in place with a higher-education provider. It is essential that EPIQ-RN providers have experience in assessing competence at the Bachelor's level or above. Non-higher education providers do not necessarily have the capability to assess students at this level and should not be eligible to provide these courses.

With regard to **Standard 1.3**, ACN believes there is discrepancy between ANMAC's regulatory aims for EPIQ-RNs and the listing of EPIQ-RNs on the Australian Qualifications Framework (AQF) National Registry at Graduate Certificate level. EPIQ-RN programs are designed to satisfy the NMBA and employers that internationally qualified nurses are competent to practice safely in Australian health care settings. In contrast, Graduate Certificates reflect "advanced knowledge and skills" that are not expected for entry-level positions (Australian Qualifications Council 2013). This is potentially problematic for both internationally qualified nurses intending to demonstrate entry-level competence, rather than attain higher qualifications, and for employers who may be required to pay higher rates for EPIQ-RN graduates with AQF level 8 qualifications. In some workplaces, nurses are entitled to a

qualification allowance if they have completed a graduate certificate.

In relation to **Standard 1.4**, ACN is strongly opposed to including CRICOS registration as part of the accreditation standards. It is ACN's view that CRICOS registration is unnecessary, as the majority of EPIQ-RNs are not intended for people arriving on student visas. EPIQ-RNs are generally delivered to nurses who have arrived on 457 visas or work visas and who have been referred to providers by the NMBA as the NMBA is seeking to confirm their competence to practise. A number of these are already resident in Australia with families and have not sought and are not seeking to enter Australia on a student visa. Requiring providers to register with CRICOS will impose unnecessary and inequitable costs on smaller providers who are not already registered with CRICOS without any added benefit to students or the profession. There is also a significant risk that some providers may choose to cease offering EPIQ-RNs if CRICOS registration becomes a requirement. This would limit access to these courses which would be a highly undesirable outcome given the level of reliance the health system currently has on overseas trained nurses.

ACN's submission on the draft Standards is attached. It is noted that we do not have any major concerns with the other modifications proposed.

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

Yours sincerely



Adjunct Professor Debra Thoms FACN (DLF)
Chief Executive Officer

25 June 2013

ACN submission on the draft *Entry Programs for Internationally Qualified Registered Nurses Accreditation Standards 2013*

Standard 1: Governance

Standard 1.1 Current registration by the Tertiary Education Quality and Standards Agency (TEQSA) as an Australian university or other higher education provider or an organisation with a formal governance arrangement with a higher education provider.

It is ACN's position that all EPIQ-RN providers should have current registration with TEQSA. ACN does not support provision in the standard for non-higher education providers to develop governance arrangements with a higher education provider, except as an interim measure for current providers.

As EPIQ-RNs should be aimed at producing 'graduates' with equivalent capabilities to Bachelor of Nursing program graduates (at a minimum), it is our view that only higher education providers accredited with TEQSA have the adequate learning environments and education capability to deliver these programs. Registered Training Organisations who are currently providing EPIQ-RNs should be required to register with TEQSA as a higher-education provider or to cease providing these programs.

If the provision for non-higher education providers to develop governance arrangements with a higher education provider is not removed from the final Accreditation Standard, ACN would expect the Standard to detail exactly what constitutes a governance arrangement in order to guarantee the quality of providers.

Standard 1.3 Listing on the Australian Qualifications Framework (AQF) National Registry for the award of Graduate Certificate (level 8) or credit towards such a program as a minimum.

EPIQ-RNs are a means of assessing the competence to practice of nurses who gained their qualifications overseas. This assessment of EPIQ-RNs is therefore primarily part of the registration process rather than an additional stage of higher education. Students who complete EPIQ-RNs should be assessed on knowledge and skills normally gained in undergraduate education. In contrast, an AQF Level 8 Qualification requires students to have "advanced theoretical and technical knowledge in one or more disciplines or areas of practice" (Australian Qualifications Council 2013). Listing EPIQ-RNs on the AQF at Graduate Certificate level (level 8) would represent a fundamental discrepancy between the aims of EPIQ-RNs and the purpose of the qualification that students receive.

Listing EPIQ-RNs at level 8 would potentially have unintended consequences. Firstly, it would mean that internationally qualified nurses would need to be more highly qualified than their Australian counterparts in order to apply for registration. Secondly, in some industrial award systems nurses with Graduate Certificates are entitled to a higher level of pay. This would impose extra costs on organisations wishing to hire internationally qualified RNs and could potentially be a barrier for internationally qualified nurses looking for entry-level positions.

ACN recognises that there is a general principle that a qualification cannot be awarded twice for the same course of study, a justification used to increase the AQF level of EPIQ-RNs to Graduate Certificate level 8. However, it is highly likely that some students will need to undertake an EPIQ-RN (or other re-entry program) more than once. For example, an internationally qualified nurse may return to his or her country of origin for a period exceeding five years, and then want to come back to Australia a second time, requiring them to repeat the EPIQ-RN program as their original registration would have lapsed. ACN has already had experience of this situation arising. Regardless of the AQF level of EPIQ-RNs, there is a strong possibility that some nurses will need to undertake an EPIQ-RN more than once.

Given that the aim of EPIQ-RNs is to assess knowledge gained in the nurses' country of origin rather than to confer a new qualification, ACN questions the need to award a qualification on completion. A statement of attainment or similar would be more appropriate.

Standard 1.4 Registered as a Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) provider.

ACN does not support the CRICOS provider status requirement of the proposed standards. CRICOS provider status is only necessary and relevant when courses are provided to people who are in Australia on student visas. EPIQ-RN courses are not targeted at student visa holders. Nurses who apply to do these courses generally hold 457 visas or work visas or are already resident in Australia and are referred to providers by the NMBA when they seek to register in Australia. CRICOS provider status is thus unnecessary. While CRICOS provider status may be beneficial to providers who wish to market courses to student visa holders, ACN strongly believes that it should not be a minimum standard that all providers are required to meet.

Including registration as a CRICOS provider in the Accreditation Standard would impose a high level of ongoing costs on current providers and, as a result, could potentially reduce the availability of EPIQ-RN courses or alternatively raise the cost to unsustainable levels.

Standard 3: Program Development and Structure

Standard 3.6 A minimum of 240 hours of workplace experience, not inclusive of simulation activities, incorporated into the program.

ACN agrees with the proposed minimum of 240 hours of workplace experience, not inclusive of simulation activities, be incorporated into the program.

Standard 4: Program Content

Standard 4.2 The central focus of the program is nursing practice, comprising core health professional knowledge and skills and specific nursing practice knowledge and skills that are evidence based, applied across the human lifespan and incorporate national and regional health priorities, health research, health policy and reform.

ACN supports the proposal that program content should include but not be limited to the content listed at 4.2.1 and 4.2.2.

Standard 4.4 Program content supports the development and application of knowledge and skills including but not limited to the content listed in the standard.

ACN support the proposal to include the content listed within this Standard.

Standard 4.5 Inclusion of subject matter that gives students an appreciation of the diversity of Australian culture, develops their knowledge of cultural respect and safety, and engenders the appropriate skills and attitudes.

ACN is in support of the modification to this draft Standard to include "subject matter" in the wording.

Standard 5: Student Assessment

Standard 5.2 Clear statements about assessment and progression rules and requirements provided to students at the commencement of the program.

ACN agrees that all students in any program of study should be provided clear information about assessment requirements and progression rules at the commencement of the program.

Standard 5.9 Assessments include the appraisal of competence in the quality use of medicines.

ACN agrees with this modification to the draft Standard.

Standard 5.13 A summative assessment of student achievement of competence against the current National Competency Standards for the Registered Nurse is conducted by a registered nurse (registered by the NMBA and who has demonstrated current experience in assessing the summative assessment of Bachelor of Nursing Students) in an Australian clinical context before program completion.

ACN supports that all assessments that take place during the program should be conducted by a registered nurse, particularly in the workplace. ACN further supports that those assessing students in the workplace can demonstrate current experience in assessing Bachelor of Nursing students.

Standard 6: Students

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.

Standard 6.4 Students are informed about, and have access to, appropriate support services including counselling, health care and educational advisory services.

ACN is in support of this draft Standard and the proposed modification.

Standard 7: Resources

ACN supports the modifications within the Standard without further comment.

Standard 8: Management of Workplace Experience

Standard 8.3 Workplace experiences are appropriate for the attainment of the current National Competency Standards for the Registered Nurse.

ACN supports the proposed modifications to this Standard. It is essential that all providers ensure their programs include appropriate support measures to provide supervision and guidance to students and that their facilities provide an environment that is conducive to a positive learning experience for students.

Standard 8.4 Each student is provided with workplace experiences reflecting the major health priorities and contemporary nursing practice. Opportunities are provided for intraprofessional and interprofessional learning and the development of knowledge, skills and behaviours for collaborative practice.

ACN supports this modification as students should only be placed in health organisations that demonstrate contemporary nursing practice.

References

Australian Qualifications Framework Council (2013), *Australian Qualifications Framework, Second Edition January 2013*. Retrieved from <http://aqf.edu.au/Portals/0/Documents/2013%20docs/AQF%202nd%20Edition%20January%202013.pdf>