

17 February 2012

2409/12

Dr Michelle Koo  
Manager  
Educational Design and Support team  
National Prescribing Service  
PO Box 1147  
Strawberry Hills  
NSW 2012

Dear Dr Koo

**Re: Core Competencies to Prescribe Medicines Safely and Effectively Draft**

Thank you for the invitation to provide feedback on the draft Prescribing Competencies Framework.

RCNA is the peak professional organisation for nurses in Australia. RCNA represents nurses across all areas of practice throughout Australia. RCNA has members in all states and territories of Australia, and internationally. A not-for-profit organisation, RCNA provides a voice for nursing by advocating on health issues that affect nurses and the community. With representation on government committees and health advisory bodies, RCNA is recognised as a key centre of influence in the health policy arena in Australia. When health policy decisions are made, RCNA presents a professional nursing perspective, independent of political allegiance.

RCNA is pleased to provide the following comments on the draft framework.

While RCNA encourages nationally focused initiatives that seek to improve prescribing practices, any competencies developed for prescribers will not take precedence over existing or future nursing competency standards recognised by the Nursing and Midwifery Board of Australia or any relevant legislation.

RCNA member feedback also supported the aims of the project, and has described the core competencies presented as being "systematic and relevant" at the "element" level. Members however questioned the relevance of the "performance criteria" on the basis that they propose re-evaluating performance criteria that would normally be taught at an undergraduate level. Member feedback also included the view that some of the core competencies would already be covered by various health practitioners' codes, standards and practice frameworks.

RCNA looks forward to the outcome of the Prescribing Competencies Framework Project and wishes you well in its undertaking.

Yours sincerely

A handwritten signature in blue ink that reads "Kathleen McLaughlin".

Kathleen McLaughlin FRCNA  
Deputy CEO  
Director, Operations