



australian college of  
nurse practitioners

ACNP Secretariat, PO Box 637, North Sydney NSW 2059  
E | [secretariat@acnp.org.au](mailto:secretariat@acnp.org.au) W | <http://www.acnp.org.au> P | 02 9016 4349 F | 02 9954 0666

01/02/2013  
6 Gardenia Close  
Craigieburn  
Victoria 3064  
Ph: 0407528288

The Secretary  
Legal and Social Issues Committee  
Legislative Council  
Parliament House  
Spring Street  
Melbourne VIC 3002  
Email: [lsic@parliament.vic.gov.au](mailto:lsic@parliament.vic.gov.au)  
Fax: (03) 8682 2878

Dear Secretary,

Re: ACNP Response to Victorian Legislative Council Inquiry into AHPRA

Thank-you for the opportunity to respond to the Victorian Legislative Council Inquiry into the performance of the Australian Health Practitioner Regulation Agency (AHPRA). I am responding on behalf of the Australian College of Nurse Practitioners (ACNP). We are pleased that this inquiry is being conducted and wish to offer our co-operation and support.

As a Professional Nursing Organisation, our comments will relate to AHPRA and the Nursing and Midwifery Board of Australia (NMBA). We will address the three key areas of cost effectiveness, regulatory efficiency, and ability to protect the public.

It's cost effectiveness:

All registration fees for nurses and midwives under the NMBA across Australia have significantly increased since AHPRA commenced in 2010. There have been no additional services added in this time to support registrants, and administration issues have not improved. As a minimum, we would like to see full-time staff available in each State or Territory to handle enquiries, including those with the specialist knowledge required to manage Nurse Practitioner issues. In Victoria, there is a professional officer able to handle Nurse Practitioner enquiries and issues two days per week, and a response can take several weeks. This person is also responsible for handling applications for endorsement as a Nurse Practitioner from Victoria and interstate. At times, there have been staff available up to four days per week; however there have still been significant issues with backlog and efficiency. This is one example of how our increased fees are not supporting registrants, with over 90,000 registered nurses and midwives in Victoria alone.

It's regulatory efficiency:

The key issue in relation to regulatory efficiency that concerns ACNP is in relation to the handling of applications for endorsement as a Nurse Practitioner (NP). A clear and consistent approach is needed.

The processing of NP endorsement applications is inefficient; there is variation in the way NP applications are handled, with no transparency of how the applications are processed, and no Nurse Practitioners being consulted in relation to application assessment. Specific concerns of the ACNP relate to inconsistencies in processing, both between State based offices, and from application to application, and that processes need to be able to withstand scrutiny of administrative appeals processes.

A major issue is the time taken to process NP applications, including many avoidable delays, these can be supported by case examples of Nurse Practitioner applications. These delays are exacerbated by what appears to be breakdowns in communication both within the Victorian office, or State based offices, and the National body, and also a lack of AHPRA or NMBA staff with the knowledge around NP application processes

Professional officers who process the applications are not always available by email or telephone, are not replaced on leave, and most are part time. Appointments to see them are very difficult to make, with the author of this submission waiting up to three months to discuss application processes in one instance. Other staff in the AHPRA office are unable to answer NP related enquiries in their absence

Delays in processing applications for endorsement as a Nurse Practitioner are costing the health system through lost productivity, and are also costing applicants through time spent on re-submitting documents, waiting for calls and emails to be responded to, and waiting for re-submissions to be assessed. Delays have resulted in applications for endorsement in some instances to take up to 24 months, with one Victorian application taking well over 24 months, and this can be supported by the case example applications aforementioned. While in some States, including Victoria, there were known to be lengthy delays in processing applications prior to AHPRA, this has not appeared to improve across the board, or in any significant way. This is compounded by the reduction in availability of support staff.

There is some use of 'experts' to 'assess' applications where it may be unclear whether the applicant meets the accepted standards, not all of these experts are Nurse Practitioners, and the experts may have no, or little knowledge of the NP role. With over 700 NP's in Australia, many have the expertise to act as consultants or sit on expert panels to assess applications and uphold the standards, and this is clearly an example of the NP community should be further engaged.

It's ability to protect the public:

Inconsistent processes at NMBA, along with significant delays in managing applications and enquiries, are leading to some highly qualified and experienced nurses not achieving endorsement as Nurse Practitioners, thus affecting health service delivery. These problems in assessing and approving NP applications lead to delays in high quality, and vital health services being available to the public, also limiting equal access to health care delivered in areas of high need.

Inconsistent processes are also leading to some applicants for Nurse Practitioner endorsement without proper experience and/or education and training. There is insufficient oversight of how applications are processed, standards upheld, and decisions made.

General statement:

The statements in this submission can be supported further by multiple case examples of Nurse Practitioner applications. The author of this response is prepared to give evidence should this be required, and will request participation of those involved in these applications to give further details and/or documents should they be required. All involved in these applications have indicated a willingness to support this submission and provide further evidence as required. These case examples demonstrate the lengthy delays, inconsistency in decision-making, and the increased costs associated in relation to the delay in health services being available to the public, and also the cost to the individuals involved.

Delays in Nurse Practitioner application result in delays in quality and timely health services being available, compromising equity of access to all members of the community, and this occurs more often in high need and rural and remote areas, as the applicant is not able to work to full capacity until their application is finalised. Additionally, it can also risk the terms of employment of the applicant. There is an extraordinary amount of effort on the part of the applicant to progress their application, and associated costs with loss of productive work time. Additionally, the ACNP is aware of applicants, advanced clinicians, who have 'given up' and not pursued endorsement as a Nurse Practitioner, further depriving the community of high quality and accessible health services. We are also committed to ensuring that NMBA is consistently applying the same standards to all applications for endorsement as a Nurse Practitioner, in order to protect the public.

The ACNP have raised these issues on previous occasions, most recently writing to the Federal Minister for Health, in November 2012.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Leanne Boase', is enclosed in a light green rectangular box.

Leanne Boase

Australian College of Nurse Practitioners Victorian Chapter Chair and Board Member

On behalf of the Board of the Australian College of Nurse Practitioners

[leanne.boase@bigpond.com](mailto:leanne.boase@bigpond.com)