**ACN Submission to ANMAC Review of Re-entry to the Register Midwife Accreditation Standards - second stage consultation**

**Survey**

BLACK = SURVEY TEXT  
RED = ACN RESPONSES

**Standard 1: Governance - criterion 1.1 and 1.8**

Proposed footnote in criterion 1.1 to ensure program providers demonstrate the quality of governance arrangements with other education providers.

Proposed criterion 1.1:

The program provider demonstrates:

Current registration with:

a. Tertiary Education Quality Standards Agency (TEQSA) as an Australian university or other higher education provider offering an entry to practice midwifery program, or

b. TEQSA as an Australian university or other higher education provider not offering an entry to practice midwifery program that has a formal agreement* in place with an Australian university or other higher education provider with current TEQSA registration and offering an entry to practice midwifery program, or

c. Australian Skills Quality Authority (ASQA) as an Australian registered training organisation that has a formal governance arrangement* in place with an Australian university or other higher education provider, which has current registration with TEQSA and offers an entry to practice midwifery program.

* Footnote: A formal contractual agreement that details the roles and responsibilities of each of the education providers in the program’s governance, design, delivery, resourcing and quality and risk management, as well as in student support, student assessment and management of midwifery practice experience.

**QUESTION 3: Do you support the inclusion of the proposed footnote in Criterion 1.1?**

**Criterion 1.1 footnote – a) YES – with comment**

If you answered ‘no’, please identify your reason(s) and state how you would amend the content of the footnote.

**Comment:** ACN raises the possibility of imposing standardised agreement criteria or an agreement framework to ensure a consistent approach to the development of contractual agreements across institutions. This could potentially strengthen the effectiveness of formal governance arrangements aimed at ensuring the quality of the education program.
Proposed rewording of criterion 1.8 to clarify credit and recognition of prior learning are not available to students undertaking a re-entry to the register midwifery program of study.

Proposed criterion 1.8:

The education provider must provide evidence of:

Strategies to inform students seeking to enter a re-entry to the register midwifery program that they are not eligible to apply for credit or recognition of prior learning.

QUESTION 4: Does the proposed rewording of this criterion clarify the position that students seeking to enter a re-entry to the register midwifery program of study are not eligible for credit, advanced standing or recognition of prior learning?

Modified Criterion 1.8 - a) YES

If you answered ‘no’, please identify your reason(s) and state how you would amend the content of the specific criterion.

No concerns.

Standard 3: Program development and structure - criterion 3.6

Proposed criterion that offers guidance on program duration.

Proposed criterion 3.6:

The program provider demonstrates:

That the minimum length of the re-entry to the register midwifery program is 3 months full time.

QUESTION 5: Do you support the inclusion of proposed criterion 3.6 in the Re-entry to the Register Midwife Accreditation Standards?

Criterion 3.6 - a) YES

If you answered ‘no’, please identify your reason(s) and state how you would amend the content of the specific criterion.

No concerns.

Standard 4: Program content

Proposed rewording (in blue text) of criterion 4.4 to more comprehensively guide content inclusion in re-entry to the register midwifery programs.
Proposed criterion 4.4:

The program provider demonstrates:

Program content includes but is not limited to supporting further development and application of knowledge and skills in:

a. **Critical thinking and** reflective practice

b. Research appreciation and translation

c. Legislative, regulatory* and ethical requirements for contemporary practice

d. Assessment, planning, implementation and evaluation of midwifery care

e. **Complex and emergency care,** including recognising and responding to deterioration in the woman and/or baby

f. Pharmacokinetics, pharmacodynamics and the quality use of medicines within the midwifery scope of practice and context

g. Health informatics and health technology.

*Footnote: Refer to professional guidance provided in NMBA policies, guidelines and codes. Available at www.nursingmidwiferyboard.gov.au/Codes-Guidelines-Statements.aspx

**QUESTION 6:** Do you support the proposed modifications to Criterion 4.4 in the Re-entry to the Register Midwife Accreditation Standards?

**Criterion 4.4a – a) YES**

**Criterion 4.4c – a) YES**

**Footnote 4.4c – a) YES**

**Criterion 4.4e – a) YES**

If you answered no to any of the above, please identify your reason(s) and clearly state how you would amend the content of the specific criterion.

No concerns.

**Standard 8: Management of midwifery practice experience**

Proposed modifications to criteria 8.11c and 8.11e to ensure the learning needs of students undertaking a re-entry to the register midwifery program of study are appropriately reflected in the minimum midwifery practice experience requirements.

**Proposed criterion 8.11:**

The program provider demonstrates:
**Criterion 8.11** The inclusion of midwifery practice experience in the program, so students can complete the following minimum supervised midwifery practice experience requirements.

*Labour and birth care*

c. Under the supervision of a midwife, act as the primary *accoucheur* for 7 women who experience a spontaneous vaginal birth, which may include women the student has engaged with as part of their continuity of care experiences.

d. Provide direct and active care to an additional 2 women throughout the first stage of labour and, where possible, during birth—regardless of mode.

*Complex care*

e. Experience in caring for 10 women with complex needs, ensuring student experiences are varied across pregnancy, labour, birth and the postnatal periods. This may include women the student has engaged with as part of their continuity of care experiences.

**NB:** All other criteria remain unchanged and footnotes to these criteria will continue to permit minimum practice requirements being counted more than once.

**QUESTION 7:** Do the specified minimum numbers in criterion 8.11c and 8.11d represent an appropriate ratio (7:2) of birth and labour care experiences for students undertaking a re-entry to the register midwifery program?

a) **YES**

If you answered ‘no’, please identify your reason(s) and state how you would amend the numbers/ratio in these specific criterion.

No concerns.

**QUESTION 8:** Do you support the proposed modification to Criterion 8.11e in the Re-entry to the Register Midwife Accreditation Standards?

a) **YES**

If you answered ‘no’, please identify your reason(s) and state how you would amend the content of this specific criterion.

No concerns.

**Complete standards**

**QUESTION 9:** Please review all standards and criteria in the second draft of the Re-entry to the Register Midwife Accreditation Standards and provide your feedback in relation to identified issues, gaps, omissions, duplications or errors.

Standard 1: no concerns
Standard 2: no concerns
Standard 3: no concerns
Standard 4: no concerns
Standard 5: no concerns
Standard 6: no concerns
Standard 7: no concerns
Standard 8: no concerns
Standard 9: no concerns
Glossary/Terms: no concerns