



Standards Review
ANMAC
GPO Box 400
CANBERRA CITY ACT 2601

Email: standardsreview@anmac.org.au

To whom it may concern

ENROLLED NURSE ACCREDITATION STANDARDS REVIEW

The Australian College of Nursing (ACN) is pleased to provide the attached response to the Australian Nursing and Midwifery Accreditation Council's (ANMAC) *Review of the enrolled nurse accreditation standards – second consultation paper*.

ACN is the national professional organisation for all nurse leaders and its aim is to ensure that the Australian community receives quality nursing care now and in the future. ACN is a membership organisation with members in all states and territories, health care settings and nursing specialties. ACN is also the Australian member of the International Council of Nurses headquartered in Geneva.

ACN congratulates ANMAC on the development of the second consultation paper that provides a comprehensive outline of phase 1 consultation deliberations as well as sound rationale for ANMAC's current proposals.

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

Yours sincerely

A handwritten signature in black ink that reads "K Ward".

Adjunct Professor Kylie Ward
Chief Executive Officer
RN, MMgt, Dip App Sci (Nursing), Acute Care Cert, FACN, Wharton Fellow, MAICD

27 February 2017



Australian
College of
Nursing

*ACN submission: Review of the enrolled nurse
accreditation standards - second consultation paper,
January 2017*

ACN submission: ANMAC Review of the enrolled nurse accreditation standards - second consultation paper, January 2017

Consultation Questions

Question 3.

Please consider proposed new wording of the following criteria (in blue text):

Sub-criterion 6.1(a) now specifying a minimum level of English language skills required by students on entry to an enrolled nurse program of study.

The program provider demonstrates:

Applicants are informed of the following before accepting an offer of enrolment:

*a. Specific requirements for entry to the program of study, including **formal** English language skills **test results equivalent to those specified in the NMBA Registration standard for English language skills***

Do you support the *inclusion* of proposed changes to sub-criterion 6.1a (above), which will introduce into the revised Enrolled Nurse Accreditation Standards a minimum level requirement for students' English language skills on program entry?

Yes No

Please provide a reason for your answer.

ACN is in support of including sub-criterion 6.1a into the Enrolled Nurse Accreditation Standards to set a minimum English language skills level requirement for students entering enrolled nurse (EN) programs of study.

As outlined in ACN's submission to the *Review of the EN Accreditation Standards First Consultation Paper 2015*, there is a need to raise the expectations of English language proficiency within nursing to better promote the safety and quality of nursing service delivery. This expectation extends to student nurses due to their roles and interactions with consumers and the intent of their educational objectives. Minimum level English language competence for students is required to provide better public protection as well as to enhance opportunities for student skills and knowledge acquisition during their programs of study.

ACN is in strong support of the position that student nurses need to demonstrate the minimum level of English language required for NMBA registration on entry to an EN program of study. As detailed in the current ANMAC consultation paper, evidence presented suggests there is insufficient time for further English language development during the EN program of study.

Furthermore, ensuring a minimum formal baseline English language assessment has been undertaken enables EN education providers to concentrate on assessing and developing broader communication skills valuable in nursing practice.

Question 4.

By specifying a minimal level of English language skills at program entry it is proposed criterion 5.6 is no longer required.

Criterion 5.6 Student communication and English language skills are assessed before undertaking workplace experience.

Do you support the removal of criterion 5.6 from the revised Enrolled Nurse Accreditation Standards?

Yes No

Please provide a reason for your answer.

ACN agrees that Criterion 5.6 becomes redundant with the inclusion of the proposed revisions to sub-criteria 6.1 (a).

Question 5.

Please consider proposed new wording of the following criteria (in blue text)

Criterion 6.3 now specifying a minimum level of language, literacy and numeracy skills required by students on entry to an enrolled nurse program of study

The program provider demonstrates:

*Students, **prior to commencing the program, are able to provide evidence* of sufficient literacy and numeracy skills to be able to successfully undertake academic experience and workplace experience requirements throughout the program.***

**Footnote: Evidence refers to a language, literacy and numeracy (LLN) test result from an Australian Government approved provider (e.g., ACER, bksb) at exit level 3 in the Australian Core Skills Framework in both reading and numeracy. Australian students who have completed an Australian Grade 12 certificate or students who have undertaken a formal English language skills test (e.g., IELTS) that meets program entry criteria, need only undertake the numeracy component of the LLN test.*

Do you support the *inclusion* of proposed wording changes to criterion 6.3 (above), which will introduce into the revised Enrolled Nurse Accreditation Standards a minimal level requirement for students' language, literacy and numeracy skills on program entry?

Yes No

Please provide a reason for your answer.

As outlined in the consultation paper, quality use of medicines by health workers is fundamentally linked to their adequate literacy and numeracy skills. With EN scope of practice incorporating medication administration, benchmarked literacy and numeracy skills should be a pre-requisite for all EN programs of study. This is an essential public safety measure that would establish more consistent and reliable assessment of student academic suitability.

While in strong support of introducing the proposed requirements, ACN notes two concerns in relation to the provision of evidence as outlined in the second sentence of the *Footnote*. Firstly, in the context of the sentence it is unclear whether "...that meets program entry criteria..." only applies to students who have undertaken a formal English language skills test or does it also apply to Australian students who have completed an Australian Grade 12 certificate. Secondly, if "...that meets program entry criteria..." does not apply to students who have completed an Australian Grade 12 certificate, ACN queries whether assessment processes map Grade 12 English results against the ACSF level 3? ACN understands that

there may be circumstances where a student can be awarded an Australian Grade 12 certificate with relatively low English performance levels as set by jurisdictional authorities. It is then queried whether these levels are mapped against the ACSF level 3 requirements or whether there is an assumption that students who have been awarded an Australian Grade 12 certificate meet ACSF level 3 requirements.

Question 6. All Standards

- > **Criterion 1.8 Policies relating to credit transfer or the recognition of prior learning that are consistent with AQF national principles and the graduate’s ability to meet the NMBA Enrolled nurse standards for practice.** ACN notes that any recognition of prior learning should be exclusive of the minimum 400 hours of workplace experience where a student is assessed against the NMBA EN standards for practice.

- > **Criterion 6.1c: The program provider demonstrates specific requirements for right of entry to health services for workplace experience.** It is noted that criterion 6.1c is somewhat ambiguous. Greater clarity may be achieved by including additional information as per the First Consultation, “The program provider demonstrates specific requirements for right of entry to health services for workplace experience (*including immunisation and criminal history*).

- > **Criterion 6.5: Processes to enable early identification of and support for students not performing well academically or with professional conduct issues.** The intent of Criterion 6.5 is not immediately clear due to the statement about students not performing “well-enough academically” being open to subjective interpretation. The statement should more specifically stipulate the given concern for example, support for students not *performing well-enough to achieve academic learning outcomes*.

- > **Criterion 8.7: Assessment of student practice against the NMBA Enrolled nurse standards for practice, within the context of the workplace experience, is undertaken by an appropriately qualified registered nurse.** It is queried whether there are particular eligibility requirements in relation to “an appropriately qualified registered nurse”? If there are no particular stipulated requirements, should “an appropriately qualified” be removed?