



Australian College of Nursing

REGULATION OF NURSE AND MIDWIFE IMMUNISERS IN THE ACT: ISSUES AND OPTIONS PAPER

The Australian College of Nursing submission to the ACT
Government – Health (September) 2018)

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General Comment

It is widely recognised that the future of health care will involve caring for an ageing population with multiple chronic co-morbidities. The increasing complexity in management of care will require the innovative use of the nurse workforce if population needs are to be efficiently and effectively met. This is of particular relevance to ACT nurse immunisers. The ACT is the only jurisdiction where nurse immunisers cannot administer vaccinations without a prescription. The current 'status quo' approach requires nurses to administer vaccines either in accordance with a standing order, prescription or as part of a first aid kit license. ACN's view is that the 'status quo' approach is time-consuming, over reliant on medical officers and does not make optimal use of nursing scope of practice within the current ACT health care context.

ACN is supportive of Option 2, as outlined within the consultation paper that would allow nurse immunisers in the ACT to be 'Authorised by Regulation'. That is, appropriately trained nurse immunisers should be '*automatically authorised to administer vaccines in accordance with defined criteria set by regulation or as approved by the Chief Health Officer*¹'. ACN believes that the 'Authorised by Regulation' approach better recognises the scope of practice of nurse immunisers' and has the potential to improve service efficiency and to support more timely access to immunisation services.

ACN is mindful that the 'Authorised by Regulation' approach will require additional support and professional development for nurse immunisers in the ACT. Furthermore, there will need to be greater transparency and communication around the medication history of an individual seeking immunisations including vaccination history. Effective use of the national 'My Health Record' system may support this and is recommended to reduce risks associated with duplication of vaccinations, drug interactions and contraindications.

ACN believes that nurse immunisers in the ACT should be viewed as a valuable resource that can be better utilised to serve community needs.

ACN response to policy options proposed to Nurse and Midwife Immunisers in the ACT

Option 1: Status Quo

ACN does not support this option as it limits efficient community access to preventative health care. The current 'status quo' approach requires nurses to administer vaccines either in accordance with a standing order, prescription or as part of a first aid kit license. ACN's view is that the 'status quo'

¹ ACT Government, Department of Health (2018). 'Regulation of Nurse and Midwife Immunisers in the ACT: Issues and Options Paper'.

approach is suboptimal and time-consuming within the current ACT health care system, and not sustainable with the increased demands expected on health care delivery. This approach also impedes efficient access to care by at risk cohorts including people in who may be isolated due to geographic and social factors.

Option 2: Authorisation by Regulation

ACN is supportive of the 'Authorised by Regulation' approach whereby appropriately trained nurse immunisers are *'automatically authorised to administer vaccines in accordance with defined criteria set by regulation or as approved by the Chief Health Officer'*.² ACN believes that the 'Authorised by Regulation' approach has the potential to improve access to health care and reduce the burden on particular health services.

ACN supports the proposal to underpin nurse immuniser initiated administration of vaccines without prescription with defined criteria embedded in regulation establishing required qualifications, training and other requirements and conditions. The requirement for nurse immunisers to complete regulated training is an important public safety measure. ACN believes this option is also the most practical and efficient as it provides a streamlined process for immunising in line with other jurisdictions.

Option 3: Authorisation by Licensing

Given that registered nurses are regulated under the National Regulation and Accreditation Scheme, Option 3 as outlined in the consultation paper is cost ineffective for both individuals and organisations. Whilst this option may provide greater oversight, assessment and monitoring of providers, registered nurses can administer immunisations within their scope of practice hence there is no need for additional licensing.

Option 4: Combination of 2 and 3

ACN does not support this option for the reasons provided in Option 1-3.

² ACT Government, Department of Health (2018). 'Regulation of Nurse and Midwife Immunisers in the ACT: Issues and Options Paper'.