



7 May 2009

The Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Secretary

Inquiry into the National Registration and Accreditation Scheme for Doctors and other Health Workers

Aged care provides vital health and lifestyle support services to a growing number of older people in Australia. Aged care organisations are direct employers of nurses, allied health and other health workers.

ACSA welcomes the creation of a national registration and accreditation scheme for doctors and other health workers. This brief submission is designed to bring the potential implications of such a national scheme on aged care service delivery, both in residential and community services, to the attention of the Senate Community Affairs Committee. There are three key issues to consider in the development of the national scheme:

- The role and scope of practice of enrolled nurses (referred to as Division II nurses in Victoria) varies significantly between states and territories. They play a key role in delivering aged care and it will be important that the scheme does not contract or limit the role and scope of practice – including medication administration and management - in any state. The national scheme should support the least restrictive scope of practice rather than advancing a scheme based on the lowest common denominator. It will be important to adjust and provide support for the training required to upskill EN's in states where this change results in an increased scope of practice.
- It is extremely difficult for older people living in residential care services, and the staff who care for them, to access GPs and other medical services. This can often cause issues in meeting legislative requirements around prescription and medication management. As a result aged care sees the development of the Nurse Practitioner role as crucial to good practice and service delivery. The creation of national registration and accreditation provides an opportunity to expand and encourage this important role. ACSA believes it is critical for the scheme to avoid any limitation to the current roles and responsibilities of nurse practitioners for the sake of national agreement.
- States and Territories have different approaches and requirements to the level of supervision of enrolled or Division II nurses. In some states they do not require direct on-site supervision of RN's. Given the shortage of nurses this needs to be maintained. It is important that the scheme maintain quality service delivery and does not create additional and unworkable regulatory burdens.

It is not uncommon for the increasingly important role aged care plays in health services for older Australians to be overlooked with most focus placed on acute care services. ACSA has drawn the above issues to the attention of the Senate Committee to ensure that it is aware of the potential impact the design of a national registration and accreditation scheme, particularly in relation to nursing staff, could have on aged care service delivery.

If you have any queries, or would like to discuss aged care further, please do not hesitate to contact me on (03) 9686 3460.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Greg Mundy', with a stylized flourish at the end.

Greg Mundy
Chief Executive Officer