



Ms Copeland
Chair, Nursing and Midwifery Board of Australia
c/o - National Registration and Accreditation Implementation Project
PO Box 2089, WODEN ACT 2606

Dear Ms Copeland,

On behalf of the Australian Private Hospitals Association (APHA), I attach our response to the consultation paper on the draft accreditation standards for nursing and midwifery.

APHA is the peak national body representing the interests of the private hospital sector, with a diverse membership that includes large and small hospitals and day surgeries, for profit and not for profit hospitals, groups as well as independent facilities, located in both metropolitan and rural areas throughout Australia. The range of facilities represented by APHA includes acute medical surgical hospitals, specialist psychiatric and rehabilitation hospitals and also free-standing day hospital facilities.

APHA appreciates the opportunity to comment on these draft proposals and would welcome the opportunity to enter into dialogue with the Nursing and Midwifery Board of Australia with regard to the points outlined in our submission.

Yours sincerely

Michael Roff
CHIEF EXECUTIVE OFFICER
17 November 2009

APHA consultation response

Response to the consultation paper on draft accreditation standards for nursing and midwifery

APHA is broadly supportive of the proposed accreditation standards and would like to acknowledge the work that the Australian Nursing and Midwifery Council (ANMC) have carried out in developing them. However, APHA opposes the introduction of the proposed accreditation standards covering registered nurses until specific changes are made to the requirement that *only* universities can provide accredited nursing degrees. We recommend that the Nursing and Midwifery Board of Australia (NMBA) change this requirement to state that only institutions that can provide bachelor nursing degrees of comparable standard to Australian universities can be accredited providers.

In stating that only universities can be accredited providers of nursing degrees the proposed accreditation standards have the potential to disallow high quality private higher education colleges from the sector. Avondale College in NSW is such a provider. Avondale has a long history of providing high quality nursing degrees that are of comparable standard to those offered by universities. Currently, Avondale College graduates around 10% of all nursing graduates in NSW. APHA believes that the proposed limitation of nursing education runs contrary to international best practice, the available evidence in this area, and would be detrimental to the future supply of the nursing workforce.

The reasons for APHA opposing the disallowance of high quality private higher education colleges from providing nursing degrees is set out below.

Basis of ANMC position

On reviewing the proposed accreditation standards it would appear on the surface that high quality private higher education colleges such as Avondale would be able to continue providing bachelor nursing degrees. All the criteria for being a provider as listed on page 10 of the accreditation standards appear to be sensible, and Avondale would meet all of these criteria. However within a footnote to the first criterion the role of high quality private higher education colleges appears to be ruled out, with little justification stated with the accreditation standards document.

Criteria '1 a)' states that course provider must show evidence of '...Australian university quality assurance and accreditation'. The definition of this evidence is contained in a footnote which states that courses given must be offered by an institution listed as a university on the Australian Qualifications Framework (AQF) register (ANMC 2009).

The document states that the argument for mandating that the course must be offered by a university has been made elsewhere, in an ANMC 2008 policy statement 'Registered Nurse and Midwife Education in Australia'). The directive that courses can only be provided by universities has not been premised upon better health outcomes for patients, or on the quality of training provided to nurses. Instead the university-only directive appears to have been instigated without

truly rigorous due process and thought both its justification and potential effects. The ANMC policy statement, which is the sole justification for mandating university-only course providers, does not provide the evidence or the justification to take this decision. APHA urgently requests that the Board review whether such an important decision can be taken on the sole advice of a policy statement. We would like to draw the Board's attention to our analysis of this policy statement.

The policy statement put forward by the ANMC to justify the exclusion of non-universities as providers of bachelor nursing degrees builds its argument based on the citation of other documents that it believes supports this decision. However, within the ANMC document there are only three citations of two documents that actually make direct reference to nursing education. These are:

1. Commonwealth of Australia (2002) National Review of Nursing Education: Our Duty of Care Report
2. Royal College of Nursing (2007) Communique from the Board of Directors: Undergraduate Nursing Education

The first of these documents is a government report and recommendation on nursing education and was published in 2002. It sets out a broad range of policy options for the government to consider. Within this document it does not present any evidence which relates to patient outcomes or the quality of nursing education within either the university or private higher education college sector. Within the document, there is *no evidence* on the role of university and non-university providers of bachelor nursing degrees. Reference is however made in this document to the World Health Organisation's 2001 'European Strategy for Nursing and Midwifery Education'. These state that bachelor nursing degree should take place in universities or equivalent higher education institutions

APHA would like to draw the attention of the NMBA to section 7.4 and 7.4.1 of the Commonwealth's 2002 report so that the Board can note that evidence is not presented there to back up the ANMC's insistence on a university only education (and thereby excluding private higher education colleges).

The second of these documents referenced by the ANMC is a policy document put forward by the Royal College of Nursing. It also provides no evidence which relate to patient outcomes or the quality of nursing education at private higher education colleges or elsewhere. APHA believes that the way to produce sound policy is to base it on evidence, such as research published in high quality peer reviewed journals. The ANMC have produced their policy document on the basis of another policy document. This only has the effect of creating policy based on the repetition of policy, not on the actual evidence..

APHA therefore urgently requests that the Board review how this decision was made and to ensure that this part of the accreditation standards are based on evidence and not supposition. We do not believe that the evidence that has been produced supports the decision to restrict bachelor nursing degrees to the university sector only. Instead the evidence that has been produced supports nurses being educated to bachelor degree *standard* in a high quality education environment.

What the evidence actually states

There has been much research within the nursing literature as to how the level of nursing education affects patient outcomes (such as Aiken *et al* 2003; Blegen *et al* 2001). APHA does not intend to debate the intricacies of the arguments set forth in such research with the Board, but do note its absence in the ANMC's policy statement (ANMC 2008) and the accreditation standards (ANMC 2009) that cover this area. However, we feel that it is extremely important that the board notes that all the research that has been carried out to examine the relationship between patient safety and educational levels of nurses has looked at *qualifications that nurses hold and not the institution where they received such qualifications*. Moreover, the influential article by Aiken *et al* (2003) states clearly that the positive relationship found between nursing education and patient outcomes was based on qualifications, not the place of qualification. In comparing patient outcomes with patient safety they specifically refer to the highest level of education achieved such as bachelor degrees in colleges and universities. This is the case for all the other studies of the subject that APHA has examined. . Research has focused on the level of education received, and not the place the education was delivered.

After carefully reviewing the literature APHA cannot identify any study that has attempted to note the difference in patient outcomes based on the place of receiving a bachelor degree (such as in a private higher education college or a university). The research that has been carried out compares those with bachelor degrees to those without bachelor degrees.

International best practice

The NMBA have asked for comments on whether the accreditation standards are consistent with other international standards. The proposal for universities to be the only permitted Australian institutions to deliver bachelor nursing degrees, excluding higher education colleges, does not sit well with international standards. The updated WHO (2009) standards state that nurses should be qualified to a bachelor degree level and that such education can be delivered in settings other than universities, such as higher education colleges and polytechnics. The WHO requirements are that such degrees are of university standard, not that universities are the exclusive domains of delivering bachelor nursing degrees.

We would like the Board to note that no such restrictions are in place in either the USA or in Europe. In these areas the preference for bachelor degree level qualifications is recognised, but there is no stipulation as to where this should be delivered. Higher education colleges are delivering bachelor degrees in nursing in these areas. Australia would therefore be moving in a different direction to other similar countries.

The effects

Should the proposed accreditation standards be allowed to stand in their current form they would have the effect of restricting competition and diversity within the nursing education sector. This would be contrary to the COAG principles of best practice regulations (COAG 2007). APHA believes that the Board should not act in an unreasonable way that restricts consumer choice.

APHA draws the Board's attention to the fact that approximately 10% of students in New South Wales undertaking nursing degree programs are enrolled at Avondale College. Should the ANMC accreditation standards be adopted and Avondale be prevented from offering accredited

bachelor degree programs in nursing there will be a serious impact on workforce supply. Places at other institutions do not exist to take these students. As the Board will be aware Australia is already facing chronic health workforce shortage problems. APHA believes that to reduce the number of nursing students based on the semantic definition of whether or not the educational institution can use university in its title, rather than based on the quality of the course offered, and resultant patient outcomes, is a backward step.

Alternative proposal

A more appropriate way to determine whether or not an institution should be accredited for the purpose of providing bachelor degrees in nursing is to set a list of criteria that relate to the quality of the course being offered, rather than a definition of what the institution is. APHA believes that the criteria listed on page 10 of the document (except for criterion 1a) and the evidence guide on page 11 (ANMC 2009) are reasonable enough to ensure that only those able to demonstrate that the courses they provide are of a high enough quality will be accredited. Should the Board believe that the criteria and evidence guide listed on pages 10 to 11 of the document are not strong without relying on the AQF's definition of a university, then the Board should consider including additional criteria and evidence guide points as required to ensure that only quality providers are accredited.

References

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