Australian
Nursing & Midwifery
Accreditation Council

Registered Nurse Prescribing
Accreditation Standards 2025

Consultation Report

Contents

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ANMAC also acknowledges the individuals and organisations who contributed to the development of the Registered Nurse Prescribing Accreditation Standards 2025 by participating in the consultation or who took the time to write a submission or respond to electronic surveys.

1.   Introduction

The Registered Nurse Prescribing Accreditation Standards 2025 (the Standards) will be used to accredit and assess education programs leading to endorsement for scheduled medicines – designated registered nurse prescriber (1) in Australia with the Nursing and Midwifery Board of Australia (NMBA).

The Standards allow registered nurses who have completed programs approved against these Standards to apply for Endorsement for scheduled medicines – designated registered nurse prescriber (1) NMBA.

The Health Practitioner Regulation National Law Act 2009 (the National Law) (2) establishes the National Registration and Accreditation Scheme for health practitioners. Section 4 of the National Law (2) sets out the objectives of the National Registration and Accreditation Scheme. The objectives are to:

- provide for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered

- facilitate workforce mobility across Australia by reducing the administrative burden for health practitioners wishing to move between participating jurisdictions or to practise in more than one participating jurisdiction

- facilitate the provision of high-quality education and training of health practitioners

- to build the capacity of the Australian health workforce to provide culturally safe health services to Aboriginal and Torres Strait Islander Peoples

- facilitate the rigorous and responsive assessment of overseas-trained health practitioners

- facilitate access to services provided by health practitioners in accordance with the public interest

- enable the continuous development of a flexible, responsive and sustainable Australian health workforce and innovation in the education of, and service delivery by, health practitioners

These objectives, combined with the guiding principles of the National Law (2) and the Procedures for the development of accreditation standards (3), underpin these Standards.

Wide-ranging consultation was undertaken to develop the Standards. Stakeholders had the opportunity to contribute in two separate rounds of consultation. They could contribute through an online survey, by way of a written submission or face-to-face.

 The Department of the Prime Minister and Cabinet Regulatory Impact Analysis Guide for Ministers' Meetings and National Standard Setting Bodies (previously the Council of Australian Governments Principles for Best Practice Regulation) (4) was considered during the development of the Standards. The Australian Government Office of Impact Analysis (5) assessed the requirement of a regulatory impact statement.

2. Background

2.1 Development of the Registered Nurse Prescribing Accreditation Standards

ANMAC reviews and develops accreditation standards based on:

- its Protocol for the review and development of accreditation standards
- Australian Health Practitioner Regulation Agency (Ahpra) Procedures for the development of accreditation standards (3).

In March 2017, the Commonwealth Chief Nursing and Midwifery Officer (Australian Government Department of Health) (6) held a national symposium to explore the potential for registered nurse (RN) prescribing. An outcome was overarching support to adopt a health professional prescribing pathway for RNs. This pathway would see appropriately trained and educated RNs prescribe within their scope of practice, under the designation or supervision of an authorised health practitioner.

A subsequent NMBA discussion paper led to the development of the proposed Endorsement for scheduled medicines – designated registered nurse prescriber Registration Standard (1) (the Registration Standard).

The NMBA requested ANMAC commence the development of associated accreditation Standards. To inform the development of the Registered Nurse Prescribing Accreditation Standards (the Standards) (7), a targeted literature review was conducted in 2019 exploring peer-reviewed journals and secondary resources. This included reports on competency and practice standards.

ANMAC also conducted a gap analysis between the:

- Prescribing Competencies Framework (8)
- Registered Nurse Accreditation Standards 2019 (9)
- NMBA Registered Nurse Standards of Practice 2016 (10).

ANMAC also conducted a detailed mapping against the ANMAC Endorsed Midwife Accreditation Standards 2015 (11).

The first round of consultation was undertaken in March 2019. The Standards were designed around the new five-standard framework and used to further inform and determine the new framework which:

- introduces a more streamlined structure consistent with other Australian health professional accreditation council standard frameworks
- reduces complexity and duplication while enabling flexibility and responsiveness
- supports innovation while ensuring core nursing knowledge and skills remain paramount
- removes repetition of evidence required in the previous nine-standard framework.

After a break in the development of the Standards, the NMBA approached ANMAC in 2023 to recommence work on the Standards project.

To inform the development of the Standards a Professional Reference Group (PRG) (members are listed in acknowledgements), was convened to oversee and provide advice to the ANMAC Chief Executive Officer for the review. The PRG advised on project planning, development of the consultation papers, standards development, stakeholder engagement and synthesis of feedback.

Essential to the consultation approach was compliance with Section 46 of the schedule in the National Law (2), which states: *In developing an accreditation standard for a health profession, an accreditation authority must undertake wide-ranging consultation about the content of the standard*. To achieve this, a list of stakeholders was developed in consultation with the PRG and invitations for participation sent for both consultations.

Consultation was conducted in two stages with each stage being 30 business days. Submissions response to both consultations, and the consultation papers, can be found at www.anmac.org.au/accreditation-standards/registered-nurse

2.2 Consultation one

ANMAC developed a paper for the first round of consultation in March 2019. It presented key areas for consideration against selected criteria. The paper also provided background on relevant issues including workforce characteristics and influences on practice.

Stakeholders consulted were asked to consider and provide responses to the issues identified in the paper including workforce characteristics and influences on practice to assist in further developing the draft standards and accompanying essential evidence guide.

The following outlines the criteria stakeholders considered and summarises feedback provided.

Criterion 1.3 – Admission requirements before enrolment regarding NMBA requirements for endorsement and the program of study's inherent requirements.

Feedback resulted in addition to criterion of ensuring applicants are on the NMBA general register as a registered nurse.

Criteria 2.2 and 2.3 – Governance structure and consultation for the design and ongoing management of the program of study.

Feedback resulted in acceptance of criteria. Essential evidence to include a curriculum vitae for the Head of Discipline as well as their NMBA registration and relevant post-graduate qualifications.

Criterion 3.2 – Teaching and learning reflects contemporary practices in health and education and responds to emerging trends based on research and technology.

Feedback resulted in amendment to criterion of teaching and learning reflecting contemporary evidence-based prescribing practice.

Criterion 3.3 – Key program content and subject learning outcomes for a registered nurse designated prescribing program.

Feedback resulted in addition to criterion of preparing students to prescribe, demonstrating an integrated approach to prescribing and understanding the registered nurse prescribing model.

Criterion 3.7 – Program resources are sufficient to facilitate student achievement of the Prescribing Competencies Framework (8) within nursing practice, with attention to human, physical and financial resources supporting all teaching and learning environments, including simulated practice.

Feedback resulted in amendment to the criterion covering attention to human, physical and financial resources supporting all teaching and learning environments.

Criterion 5.4 – Assessments include the evaluation of the prescribing process, underpinned by the quality use of medicines and the Prescribing Competencies Framework (8).

Feedback resulted in amendment to criterion of assessments including the prescribing process. Essential evidence to incorporate the Assessment of Prescribing in Health (ASPRINH) Prescribing Assessment Toolkit (12).

Criterion 5.6 – Education provider is ultimately accountable for ensuring mechanisms are in place for assessing students in their prescribing practice.

Feedback resulted in addition to criterion to ensure mechanisms are in place for assessing students prescribing practice in theoretical and practice contexts.

ANMAC synthesised consultation feedback, which the PRG then reviewed and approved. Outcomes from this process influenced amendments to the initial draft of the Standards which were published in the second consultation paper.

2.3   Consultation two

The second stage of consultation took place in October 2023. The Office of Impact Analysis (OIA) (5) determined that there needed to be consultation on the regulatory impact of the NMBA proposed Registration Standard and associated guidelines, which led to the delay prior to the second consultation on the draft Accreditation Standards. The NMBA reviewed the regulatory impact Registration Standard and associated guidelines and undertook other foundational activities, resulting in the development and consultation on the regulation impact statement (C-RIS) (13) in July 2023.

The second draft of the Standards were informed by collated feedback from the ANMAC Board, Strategic Accreditation Advisory Committee, the PRG and stakeholder submissions to the first round of consultation. There were two key areas identified – governance and program content.

The draft Standards were presented along with references to the criteria they were mapped from the:

- Registered Nurse Accreditation Standards 2019 (9)
- ANMAC Endorsed Midwife Accreditation Standards 2015 (11)
- Prescribing Competencies Framework (8).

Stakeholders were asked to consider the following criteria when discussing the issues raised in the second consultation paper:

Criteria 2.2 and 2.3 – Support for the governance structure and consultation for the design and ongoing management of the program of study.

Feedback indicated a majority considered these criteria to be appropriate and that interprofessional relationships are integral to quality and safety in nurse prescribing. Some comments requested that academic governance of the program stipulate the school of nursing.

The PRG further strengthened these criteria by including the school conducting the 'Registered Nurse Prescribing' education program and 'leadership' from the nursing school.

Criterion 3.3 – Focus is sufficient for knowledge requirements for designated registered nurses to safely prescribe scheduled medicines in accordance with a prescribing agreement with an authorised health practitioner.

Feedback indicated that a majority agreed that the criterion covered all key aspects. The importance of prescribing to vulnerable populations was noted.

The PRG recommended amending the criterion to include subject 'alignment' rather than outcomes to ensure a focus on the knowledge requirements for designated registered nurses.

Other issues considered with additional comments

Feedback resulted in additional comments regarding legislation and Aboriginal and Torres Strait Islander peoples' content and terminology to support cultural safety.

One respondent found that Criterion 2.1b – which includes the requirement for education providers to have current ANMAC accreditation and NMBA approval of an entry to practice registered nursing programs – could be seen as an unnecessary restriction of the provision of the education program and that any independent education provider, that meets certain standard should be able to deliver the education program.

The PRG supported this requirement based on the following rationale:

- Education providers who offer pre-registration RN education programs are able to view prescribing as integrated into holistic RN practice by virtue of their experience in delivering a comprehensive and quality RN education program and will be able to easily scaffold the further prescribing capabilities in the safe management of medicines for the designated RN prescriber model.
- These education programs also have a foundation of sophisticated interprofessional relationships with other health professions which is essential requirement of the designated RN prescriber model.
- The approach taken for RN prescribing aligns with the approach taken in the Accreditation Standards for Programs Leading to Endorsement for Scheduled Medicines for Midwives (11) and other regulated health practitioners that have a prescribing endorsement.

Outcomes from this consultation process influenced amendments to the second draft of the Standards and essential evidence guide, for further consideration by the PRG.

ANMAC synthesised and reviewed. It was then published on www.anmac.org.au/accreditation-standards/registered-nurse

2.4 Finalisation of the draft Standards

After reviewing feedback of the second consultation, the PRG held a third meeting in January 2024 to consider and discuss the key areas noted. This included ongoing concerns regarding the stipulation for an approved entry to practice program as a governance requirement.

In addition to the PRG, the Registered Nurse Prescribing Regulatory Impact Group, established by the NMBA, supported the foundation and rationale for an approved entry to practice program as a governance requirement:

- *Education providers who offer pre-registration registered nurse education programs are able to view prescribing as integrated into holistic registered nurse practice. This is by virtue of their experience in delivering a comprehensive and quality registered nurse education program.*

- *Existing pre-registration registered nurse education programs already include the foundational skills and knowledge to competently supply under protocol and policy. Therefore, these education providers will be able to easily scaffold the further prescribing capabilities in the safe management of medicines for the designated RN prescriber model. These education programs also have a foundation of sophisticated interprofessional relationships with other health professions, an essential requirement of the designated registered nurse prescriber model.*

- *The approach taken for RN prescribing aligns with the approach taken in the Accreditation Standards for Programs Leading to Endorsement for Scheduled Medicines for Midwives (11). This approach, as with midwifery prescribing, will enable the education to be embedded within pre-registration registered nurse education programs. Currently all education providers (across both nursing and midwifery professions) delivering an NMBA approved program leading to endorsement also offer a pre-registration program for that profession.*

2.5 Regulatory impact assessment

The COAG Principles for Best Practice Regulation were taken into account during the review of the Standards. This included presenting draft Standards during the review to the Office of Impact Analysis (Australian Government Department of the Prime Minister and Cabinet – previously the Office of Best Practice Regulation) (4).

ANMAC followed the process of the previous office and submitted the Standards for preliminary assessment. This assessment considered the benefits and burdens of introducing the Standards as well as the potential impact for stakeholders.

The Office of Impact Analysis (OIA) (5) considered the Standards as presented and determined that a decision regulation impact statement was required. The NMBA reviewed the regulatory impact of the Registration Standard and associated guidelines and undertook other foundational activities, resulting in the development and consultation on the regulation impact statement, which has since been endorsed by the OIA.

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