

13 May 2011

Ms Anne Copeland
Chair, Nursing and Midwifery Board of Australia
Australian Health Practitioner Regulation Agency
GPO Box 9958
Melbourne VIC 3001

Dear Ms Copeland

Re: NMBA Professional Indemnity Insurance Arrangements Registration Standard and Guidelines: Professional Indemnity Insurance for Midwives

Thank you for the opportunity to provide feedback on the revised Professional Indemnity Insurance Arrangements Registration Standard and the newly developed Guidelines: Professional Indemnity Insurance for Midwives referred to in your letter dated 10 March 2011.

The Council of Deans of Nursing and Midwifery has considered the draft documents and is of the view that the documents are reasonably comprehensive. We would, however, like to draw your attention to a couple of areas which we feel require further clarification:

- In terms of 'Run-off cover', there is no indication of how long that cover might be. For example, would this be the term of the midwives natural life? Or would it be 25 years in keeping with the storage of medical records? In addition, what sort of cost may be attached to this ongoing cover?
- In response to your request for feedback on the two approaches and the self-assessment criteria, unless midwives know what the base costs might possibly be, it is difficult to know whether they are fair and equitable. How consistently would a cost structure be applied without knowing what a base minimum cost is? Would it be possible to provide, in the consultation phase, an assessment of what the cost scales may be if the factors set out under the "Scope of the insurance required" were applied? For example, what would be the bands for 50-99 births, 100 -149 births per year etc.?

Thank you once again for the opportunity to comment on the draft documents and I would be pleased to discuss these issues with you further at your convenience.

Yours sincerely

Professor Patrick Crookes
Chair, Council of Deans of Nursing and Midwifery
(Australia & New Zealand)