



15 December 2014

Ms Tanya Vogt  
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By email: [nmbafeedback@ahpra.gov.au](mailto:nmbafeedback@ahpra.gov.au)

Dear Ms Vogt

**Proposed Registration Standard endorsement for scheduled medicines for eligible midwives**

Thank you for the opportunity given to the Australian Nursing and Midwifery Federation (ANMF) to provide a submission on the public consultation for the proposed registration standard endorsement for scheduled medicines for eligible midwives.

Our response represents the views of our registered midwife members who number over 19,000, through consultation with the ANMF State and Territory Branches.

We offer the following comments for consideration and wish to note these comments are in addition to the ANMF submission in the preliminary consultation paper for the registration standard endorsement for scheduled medicines for eligible midwives provided on 11 July 2014.

**Option Statement**

The ANMF support option 2, the implementation of the proposed draft registration standard. The ANMF do however request a number of revisions are added to provide further clarity.

**Question 1. Is the content of the draft revised registration standard, helpful, clear, relevant and more workable than the current standard?**

The proposed registration standard is user friendly and provides a less complex process for achieving eligibility as a midwife.

**Question 2. Should the registration standard require an eligible midwife to practice across the continuum of care or should eligible midwives be able to have a specified context of practice listed on their notation?**

The ANMF supports the proposed change to the registration standard. Broadening the requirement for scope of practice beyond the continuum of care model to encompass a specified scope of practice enables experienced specialist midwives to access eligibility and then subsequently provide specified care such as lactation consulting or postnatal home care as Medicare Benefits Schedule (MBS) rebatable services for women.

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**ANMF Journals**

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The current requirement for eligible midwives to work across the full continuum of midwifery care has disadvantaged these midwives and the women for whom they provide midwifery services. The decision to extend eligibility to midwives working in a specified scope of practice is supported by the ANMF as it will increase access to maternity services and recognise the expertise of the existing midwifery workforce.

**Question 3. Is there any content that needs to be changed or deleted in the registration standard?**

Further clarification is required under the sections '*what must I do*' and '*ongoing eligibility*'. The proposed standard could be misinterpreted to give the impression there is ongoing eligibility requirements to work 3 years full time or 5000 hours within the past 6 years. We understand this is not the intention of the standard. However, if this were the intention of the standard, the ANMF would not support this requirement, as it is inconsistent with the recency of practice registration standard and would add a further unreasonable regulatory burden to eligible midwives.

Clarification could be achieved by adding the word '*initially*' to the first line under the section '*what must I do*'. The first line should read: 'To be initially endorsed for scheduled medicines.... Further wording should also be added to the section '*what does this mean for me*' under '*at renewal of registration*', the sentence should read: *when you apply to renew your registration, you are required to declare that you comply with the ongoing requirements of this registration standard.* These additions will assist in separating the requirements for initial endorsement to those for ongoing eligibility.

In the definition of context of practice, the word condition should be replaced with parameters. Conditions has a specific meaning within the regulatory context and the use of the term conditions in this definition could be confusing.

Lastly, the definition of scope of practice should include the professional role and services that the individual health practitioner is not only educated and competent but also authorised to perform.

**Question 4. Is there anything missing that needs to be added to the registration standard?**

The ANMF do not have anything further than those issues identified in response to question 3 to add.

**Question 5. Do you have any other comments on the registration standard and options presented?**

The ANMF support the proposed registration standard with the changes outlined above. This standard is more flexible for midwives and will provide a streamlined process that is less complex, and more fair and equitable.

The ANMF appreciates the opportunity to provide a submission on the public consultation for the proposed registration standard endorsement for scheduled medicines for eligible midwives.

Should you require further information on this matter please contact Julianne Bryce, Senior Professional Officer, ANMF Federal Office Melbourne, on 03 96028500 or [julianne@anmf.org.au](mailto:julianne@anmf.org.au).

Yours sincerely



**Lee Thomas**  
Federal Secretary