

Professor Michael Permezel
President



**The Royal Australian
and New Zealand
College of
Obstetricians and
Gynaecologists**

ABN 34 100 268 969

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Ms Tanya Vogt
Executive Officer
Nursing and Midwifery Board of Australia
AHPRA
GPO Box 9958
Melbourne VIC 3001

Excellence in Women's Health

College House
254 - 260 Albert Street
East Melbourne Vic 3002
Australia
telephone: +61 3 9417 1699
facsimile: +61 3 9419 0672
e-mail: ranzcoq@ranzcoq.edu.au

Dear Ms Vogt

Re: Registration Standard for Endorsement for Scheduled Medicines for Eligible Midwives

Thank you for the opportunity to provide feedback on the Nursing and Midwifery Board of Australia (NMBA) consultation paper on the Registration Standard Endorsement for Scheduled Medicines for Eligible Midwives. The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) is pleased to provide answers to the consultation questions posed in the consultation paper.

Options Statement

RANZCOG notes the preference of the NMBA for Option 2, the revised registration standard, which combines existing standards regarding Eligible midwife registration and the registration standard for endorsement for scheduled medicines for midwives.

While acknowledging the rationale for the development of the revised registration standard, including greater flexibility and streamlining of processes, RANZCOG does not support the proposed registration standard endorsement for scheduled medicines for eligible midwives.

Consultation Questions

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

Yes; RANZCOG is not in a position to comment on whether the specific mechanism proposed through the draft revised registration standard is more workable than the current standards, however acknowledges that streamlining of processes can be reasonably expected to do so.

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?*

RANZCOG notes that notation as an eligible midwife on the register indicates that the individual is deemed to be competent to provide pregnancy, labour, birth and postnatal care to women and their infants, and to order diagnostic interventions appropriate to the eligible midwife's scope of practice.

RANZCOG supports a requirement for eligible midwives to practice across the continuum of care rather than being able to have a specified context of practice listed on their notation.

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

See response to Consultation Question 4 (below).

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

RANZCOG is concerned by the proposal to remove the criteria of 'Current competence to provide pregnancy, labour, birth and postnatal care to women and their infants' from the revised standard. While acknowledging that some consider this requirement is not appropriate for a registration standard, RANZCOG is of the opinion that the NMBA, like all National Boards, has an obligation to the community to ensure, as far as possible, that its registrants remain 'fit to practice' across their scope of practice and for this reason, that reference to currency of competence is essential and should be retained in the registration standard.

RANZCOG also does not support the removal of the criteria of 'Successful completion of an approved professional practice review program for midwives working across the continuum of care'. While acknowledging that some consider this requirement is not appropriate for a registration standard, RANZCOG is of the opinion that, as with the criteria of current competency, the NMBA has an obligation to the community to ensure, as far as possible, that its registrants remain 'fit to practice' across their scope of practice. For this reason, RANZCOG considers that completion of an approved professional practice review program across the continuum of care is essential and should be retained in the registration standard.

Should the NMBA choose to proceed with the removal of these two criteria from the registration standard, RANZCOG would urge the National Board to develop a code(s) or guideline(s), as appropriate, addressing fitness to practice across the continuum of care for Eligible midwives as a matter of priority.

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

No.

RANZCOG thanks the NMBA for the opportunity to provide comment on the Options Statement and draft Registration standard for scheduled medicines for eligible midwives.

Yours sincerely



Michael Permezel

President