

November 29, 2010

Nursing and Midwifery Board of Australia
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Re: Draft English language skills registration standard

Thank you for the opportunity to provide comments relating to the draft English language skills registration standard dated 11 November 2010 (Draft Standard).

Queries and concerns outlined relate to interpretation of the Draft Standard and contradictions identified. These are shared by some colleagues and students currently enrolled in the University of Ballarat Bachelor of Nursing (BN) program, undertaken in Australia, and applicants who accepted an offer to enrol in February, 2011. I recently asked current international students their interpretation of the Draft Standard. All responded that the Draft Standard clearly indicated that:

- *On completion of the BN they would not need to submit any further evidence of English language competency and that once signed off as competent by the head of school, they would be eligible to apply for registration with the NMBA.*

I also share their interpretation of the Draft Standard as do others I have consulted. However, like colleagues I believe that some wording in the Draft Standard should change and in some instances deleted to enable a consistent and accurate interpretation, and to prevent any misunderstandings when the Draft Standard is implemented.

Summary of conclusions drawn from interpretation of the Draft Standard:

1. All Graduates (domestic and international) from Australian tertiary nursing and midwifery programs (accredited by the ANMC) **do not** have to provide evidence of IELTS/OET levels on application to register with the NMBA;
2. Graduates from other countries listed in the Draft Standard **do not** have to provide evidence of IELTS/OET levels on application to register with the NMBA; and
3. All other applicants - for example (i) direct application for registration with the NMBA and not required to undertake any study in Australia, and (ii) those applying to a 'Bridging' program like the 12 week Initial Registration Program for Overseas Nurses [IRON]) **do** have to provide IELTS/OET levels at the time of Application to register with the NMBA.

These conclusions appear to be the same/similar as those reflected in the current Standard with the exception that the Draft Standard now states that all graduates from "tertiary" programs that enable entry level into nursing and/or midwifery will be eligible to apply for

registration, and not evidence of completion of secondary schooling, taught and assessed in English which was the requirement of the July 2010 NMBA English language skills standard. This change is commended. So too are other aspects of the Draft Standard as it:

- Protects the public (all graduates meet all competencies including demonstration of English language skills, in context);
- Does not discriminate, or disadvantage any graduate by having the same initial registration requirements for domestic and international students, given all graduates (domestic and international) have met all the requirements of the same program of study;
- Does not bring the tertiary sector and the profession of nursing into disrepute with the view that academic and clinical assessment is not trusted (where international students are concerned) and that only an IELTS or OET test determines competency in context.
- Recognises the status of tertiary education (theoretical and clinical) and the fact that the nursing programs offered in the tertiary education sector are fully accredited by the ANMC - the regulatory authority, and respective tertiary organisations; and
- Recognises that all associated with the teaching and learning of professional nurses (academics and clinical teaching staff and registered nurses) are professionals (ethical, accountable), and exceptional in assessing the skills and abilities (competencies) in context of future registered nurses and colleagues, which is clearly part of delivering safe and competent care to the public.

To enhance the clarity of the Draft Standard further, the following recommendations are made, and rationales provided.

Recommendations and rationale:

1. Change the following statement:

From:

*The Board considers that applicants who have been taught **and** assessed in English in their tertiary, entry to practice nursing and/or midwifery education in the countries listed here should meet this requirement. The countries are: Australia....United States of America. (NMBA Draft Standard, 11th November, 2010, p.1).*

To:

The Board considers that applicants who have been taught **and** assessed in English in their tertiary, entry to practice nursing and/or midwifery education in the countries listed here should meet this requirement and are not required to supply IELTS or OET results on seeking initial registration as a nurse or midwife. The countries are:
Australia....United States of America.

Rationale:

- Stating that applicants who have met the criteria above (tertiary, entry to practice...countries listed...) ‘are not required to supply IELTS or OET results on seeking initial registration as a nurse or midwife’ would clearly state the fact intended.
- Stating that these specific applicants are not required to supply IELTS or OET results on seeking initial registration would prevent the focus on the word ‘should’ in the statement; thus prevent students and potential applicants continually seeking clarification with the NMBA. At the same time, inclusion of these additional words would still enable enactment of point 8 “the Board reserves the right at any time to require an applicant seeking initial registration to undertake an English language test as specified by the Board” (NMBA Draft Standard, 2010, p.2), if required.

2. Scope of Application - Change the statement:**From:****“Scope of application**

This registration standard applies to all applicants seeking initial registration as a nurse or midwife in Australia, including students holding student registration at the time of application. It does not apply to applicants:

- a) Who are currently registered with the Board in any other category of registration*
or
- b) Who have been registered under previous legislation as a nurse or midwife in any jurisdiction in Australia.”* (NMBA Draft Standard, 2010, p.1).

To:**“Scope of application**

This registration standard applies to all applicants seeking initial registration as a nurse or midwife in Australia. It does not apply to applicants:

- c) Who are currently registered with the Board in any other category of registration*
or
- d) Who have been registered under previous legislation as a nurse or midwife in any jurisdiction in Australia.”*

Rationale:

- As the Board has determined that all students applying for initial registration after completing a tertiary program in nursing in Australia, taught and assessed in English should be eligible for registration, then the reference to ‘including students holding student registration at the time of application’ is not required and its inclusion may create confusion.

3. Statement not required

3.1 Remove the following statement:

“4 b) is a registered student who was required to provided (sic) an IELTS of 7 or equivalent at the commencement of his or her program of study and who has successfully completed the program of study in a full-time or part-time capacity in English, in a period that is a greater than two (2) years.”

Rationale:

- This statement contradicts those outlined in the ‘Summary’ and ‘Requirements’ as the Draft Standard clearly states that applicants who have demonstrated completion of ANMC accredited tertiary entry level programs in Australia are eligible to apply for registration with the NMBA. Therefore, the reference to IELTS 7 in the statement contained in 4b is not required;
- In circumstances where IELTS 7 was required by tertiary organisations to meet entry criteria to a program (as outlined in the curriculum), then it is still not necessary to refer to having to demonstrate this level again, to be eligible to apply for registration with the NMBA as the Draft Standard clearly states that applicants who have demonstrated completion of ANMC accredited tertiary entry level programs in Australia are eligible to apply for registration with the NMBA. Therefore, the reference to IELTS 7 in the statement contained in 4b is not required; and
- The relevance of a statement referring to a length of time required to be studied in a program to be contained in the English language skills registration standard is queried. It is my understanding that this decision is made by the ANMC (via standards and accreditation of curricula); and the tertiary sector in accordance with strict credit and RPL policies that are based on sound academic and award qualifications and are outlined in the ANMC accredited curricula. *It is for this reason that in my opinion, the entire 4b statement should be removed from the NMBA Draft English language skills standard. However...*
- If the statement is an attempt to differentiate graduate entry students *from disciplines other than nursing* by referring to the need to complete at least a two year study program then this again is not clear; and if necessary to be contained in the NMBA English language standard, then the following is proposed.

3.2 Proposed alteration if statement 4b is not removed

“4 b) is a registered student who entered an entry to practice program in Australia via ‘graduate entry’ criteria **and holds a degree in a discipline other than nursing**, a study program of greater than two (2) years in a full –time or part-time capacity equivalent Is required.“

Rationale:

- The uniqueness of students with existing nursing qualifications, registration in their home country and currency of practice is not recognised in 4b Draft Standard and as such, the length of time proposed appears to be the same as for any graduate entry

student (such as those from a *completely* different discipline). Clearly, this should not be the case. A reduced length of time should be applicable for overseas registered nurses equivalent to Division 1 nurses in Australia, such as 12-18 months (or equivalent). Not to differentiate between current registered professional nurses and those without a background in nursing in my opinion would be unacceptable to the nursing profession and community and unjustified educationally.

- The process to determine the length of program and course to study should be based on a comprehensive ‘mapping’ process related to the individual, with specific evidence to be supplied, be flexible but within set parameters (ANMC and tertiary organisations) guidelines. This process should be undertaken by expert academics charged with the responsibility of the teaching and learning of **all** nursing and midwifery students.
- A comprehensive ‘mapped’ individual program that takes into account a number of aspects is preferred rather than a ‘blanket’ 2 years. Areas to consider by the tertiary organisations in conjunction with the ANMC guidelines for example: a *minimum* of 33% of study in an Australian BN to be completed, evidence of current registration as a nurse in their home country, the undertaking of comprehensive mapping of previous curricula completed (many students already have a BN gained from their home country) and subsequent qualifications obtained (3 year Diploma of Nursing or 4 year Degree of Nursing) and currency of practice.
- Again, there is no need for a reference to IELTS 7 in the statement, given the completion of a tertiary, entry to nursing and midwifery program is considered to have met the requirement of English language skills standard.

3.3 Criteria for length of study time if to be included in the Standard – an example

If it is determined by the NMBA that registered nurses in their home country equivalent to Division 1 Nurses in Australia must complete a period of 2 years (or equivalent) study in Australia, then this length of time should be based on educationally sound principles, and ensure the best outcome for the student, and the nursing profession. For example the 2 years (or equivalent) could be made up of the following combinations after the individual ‘mapping process’ outlined above and therefore should be recognised by the NMBA:

- a) 12 months (or equivalent) study in a BN (courses to complete based on mapping); and
 - b) 12 months (or equivalent) study in a Post Graduate Diploma of Nursing
- or alternatively**
- a) 18 months (or equivalent) in a BN (courses to complete based on mapping); and
 - b) 6 months (or equivalent) in a Graduate Certificate of Nursing

Rationale

- The above enables enculturation, meeting ANMC competencies (and NMBA registration), and students to develop knowledge and skills at a higher level that is beneficial to the individual nurse, the health care industry, and the nursing profession in Australia; and importantly recognises differences between students. Overall, the public remains protected.

4. Transition period for implementation of any changes to the existing current Standard (July 2010).

Rationale:

- Any changes (even those considered minor) have the potential to significantly impact on current students and their families, potential applicants and other stakeholders. Changes without a transition period could severely impact on the status/reputation of professional nursing in Australia, Australian universities and the employment of graduates in the health care sector in Australia. Therefore, the implementation date of ddmm2010 (note 2010) on the Draft Standard should be reviewed.

5. Circulation of a Final Draft Standard and accompanying Explanatory Notes for comment before ratification of new English language skills standard

Rationale:

- It is expected that the feedback received from the consultation process currently underway may change/alter/clarify the proposed new English language skills registration standard. In my opinion, the release of a **Final Draft and accompanying Explanatory Notes** for final comment would enable a more accurate interpretation and clarity of The Standard as intended, to all stakeholders.

Yours sincerely,

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