Nursing Council of New Zealand PO Box 9644 WELLINGTON 6141

## Consultation on the scope of practice and qualifications for nurse practitioners

Thank you for inviting me to comment on the Nursing Council of New Zealand's consultation on the scope of practice and qualifications for nurse practitioners.

As you are no doubt aware, my Office is charged with promoting and protecting the rights of health and disability services consumers, as set out in the Code of Health and Disability Services Consumers' Rights (the Code). One of my functions under the Health and Disability Commissioner Act 1994 is to make public statements in relation to any matter affecting the rights of health or disability services consumers.

## Prescribing rights for all nurse practitioners

I am supportive of all nurse practitioners having authorised prescribing rights, rather than this varying by individual. The removal of this variation within the nurse practitioner scope of practice, is likely to lead to consumers being better informed about what they can expect from a nurse practitioner.

I commend the Council on its focus on continuing professional development and continuing competence requirements for nurse practitioners. From a health consumer's perspective, it is important that the Council's education programmes provide nurse practitioners with the necessary skills and knowledge to ensure that prescription services provided to health consumers are of an appropriate standard throughout a nurse practitioner's career.

## Communication and documentation

While recognising that the majority of nurse practitioners are already authorised prescribers, I take this opportunity to make a few additional comments about prescribing by nurse practitioners generally.

In my view, good communication between nurse practitioners and other health professionals is the key to the success of shared prescribing rights. The importance of cooperation between providers is recognised in Right 4(5) of the Code, which states that "every consumer has a right to co-operation among providers to ensure quality and continuity of services". A key issue in maintaining continuity of care is the recording of adequate and appropriate clinical notes. Clinical records underpin safe, effective and timely clinical practice, and the importance of adequate documentation is heightened when a consumer receives care from more than one provider as part of a collaborative team approach. It is therefore important that nurse practitioners consistently maintain accurate and comprehensive clinical records.

If it has not done so already, I suggest that the Council gives consideration as to how nurse practitioners communicate information about their prescriptions to their patients' GPs. It may also be useful to develop guidelines for referral back to GPs in situations where there are complicating factors (eg, the possibility of an adverse interaction with other medicines that are being taken).