

19 April 2013

Nursing Council of New Zealand
PO Box 9644
WELLINGTON 6141

Submission on proposals for registered nurse prescribing

Thank you for inviting the Health and Disability Commissioner to comment on the Nursing Council of New Zealand's consultation document on two proposals for registered nurse prescribing: community nurse prescribing and specialist nursing prescribing.

The Commissioner 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 the Commissioner's 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.

The following comments apply to the proposals for both community nurse prescribing and specialist nurse prescribing. Please note that this submission does not address the clinical appropriateness of nurse prescribing to the extent outlined in the consultation document. Rather, the focus of this submission is on ensuring all clinicians provide consumers with integrated and competent care that maximises consumer safety.

Cooperation among providers

Good communication between nurses and other health practitioners, particularly a consumer's general practitioner, is essential to the success of shared prescribing rights. We agree that, in some circumstances, patients will benefit from obtaining prescriptions directly from a nurse, rather than requiring referral back to a doctor. However, this benefit needs to be balanced with ensuring any medicines prescribed by nurses do not adversely affect or interact with other medicines the patient may be taking, or other medical conditions the patient may have. The importance of cooperation among providers is recognised in Right 4(5) of the Code and we commend the Council's recognition of this concept in the competencies for nurse prescribers.

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 accentuated when a patient receives care from more than one provider as part of a multidisciplinary team approach to care. It is therefore important, as acknowledged in the proposed

competencies, that nurse prescribers consistently maintain accurate and comprehensive clinical records, including in relation to prescribing decisions.

Qualifications and competence

From a health consumer's perspective, it is important that the training programme established by the Council for nurse prescribers provides them with the necessary skills and knowledge to ensure that prescriptions services provided to health consumers are of an appropriate standard. The qualifications and ongoing education put in place to educate nurse prescribers should be rigorous.

In addition to the proposed competencies for nurse prescribers, we suggest that the Council gives consideration to developing a guideline for appropriate nurse prescribing. This Office frequently refers to the Medical Council's statement on "Good Prescribing Practice" (April 2010), which we consider to be a helpful overview of the matters of which prescribers should be aware. A similar guideline for nurse prescribers could include advice, for example, on circumstances in which nurses should refer patients back to medical practitioners.

We trust these comments are helpful.

Yours sincerely

Katie Elkin
Chief Legal advisor