

## Summary of consultation feedback | July 2017

# Policy for the Authorisation of Yellow Fever Vaccinators and Yellow Fever Vaccination Centres

A summary of the key themes from the Ministry of Health's (the Ministry) June 2017 consultation *Policy for the Authorisation of Yellow Fever Vaccinators and Yellow Fever Vaccination Centres* is presented here.

The Ministry received ten submissions. The consultation process was initially open for a period of three weeks from 23 May to 9 June. It was then extended for a further week to 16 June. We appreciate all the feedback that we received and acknowledge the time people took to respond. We have carefully considered all responses and have summarised the key themes below. Some minor wording suggestions have already been incorporated into the policy. Overall, there was support for the changes to the policy that enables nurse practitioners and registered nurses to be authorised as yellow fever vaccinators.

## Summary of Key Themes

### 1) Population Health 763 Human Vaccinology and the International Society of Travel Medicine Certificate

The following was identified:

- Neither the content nor depth of knowledge required are equivalent between the above qualifications.
- Many of the registered nurses applying for yellow fever vaccinator authorisation will be experienced travel health professionals whose knowledge surpasses that taught in the above qualifications.
- There is a potential for accessibility barriers regarding these two qualifications:
  - POPHLTH 763 is a University of Auckland paper, offered alternate years.
  - The exam for the ISTM Certificate is only held in conjunction with international conferences.

Based on the feedback received, the requirement for registered nurses to complete either POPHLTH 763 or the ISTM Certificate has been removed. This decision is due to the accessibility of the qualifications and that registered nurse applicants must have a postgraduate diploma in public health and a minimum of five years postgraduate experience, including three years' experience working in travel health.

### 2) Concern of levels of experience and technique for safe immunisation of infants and young children for medical and nurse practitioners

We acknowledge the above comment and have incorporated the following recommendation:  
*"When a Medical Practitioner or Nurse Practitioner does not regularly administer vaccines to infants and young children over 9 months of age, it is recommended that vaccine administration is delegated to a health professional who is confident with the different vaccine sites and positioning for immunising infants and young children."*

### 3) Barriers to a postgraduate qualification for some applicants

- Health Workforce New Zealand do not include funding of a postgraduate qualification in travel medicine as part of their funding for registered nurses and nurse practitioners.

We acknowledge the above comment and have incorporated the following recommendation: *“An equivalent postgraduate qualification or training from a recognised international or national university or institution, accepted at the discretion of the Director-General of Health or their delegate”*

### 4) A minimum number of hours per week working in travel health to be defined

- An adequate level of clinical exposure will ensure that a registered nurse has suitable experience of travel medicine.

We acknowledge the above comment. The registered nurse application requirements include a postgraduate qualification in travel health, five years postgraduate experience with a minimum of three years of travel health experience, and that the applicant is currently working in travel health. Therefore registered nurse applicants should have suitable experience of travel medicine.

## Additional Comments

### Removal of Nurse Prescriber pathway

Currently this pathway allows nurse prescribers to prescribe commonly used medicines for common conditions from a specified list of medicines. The Nurse Prescriber pathway has been removed as the yellow fever vaccine is not a commonly used medicine, nor does it feature on the list of medicines. Nurses who are nurse prescribers can still apply for yellow fever vaccinator authorisation under the Registered Nurse pathway.

### Clarification of differences in re-authorisation periods

The yellow fever vaccine is a prescription medicine and the authorisation to administer a prescription medicine, otherwise than pursuant to a prescription, falls under Medicines Regulations 1989, reg 44A. Unfortunately, this authorisation is only valid for a period of two years and is the reason for the difference in yellow fever vaccinator authorisation periods. Along with the Ministry's Legal Team, we investigated a number of different ways for registered nurses to become authorised yellow fever vaccinators and administer yellow fever vaccine without a standing order, and this regulation is the only way it can currently be achieved.

### Conditions of scope for nurse practitioners

As of 6 April 2017, newly registered nurse practitioners are no longer restricted to a specific area of practice. As advanced clinicians, they are expected to self-regulate and practice within their area of competence and experience. It is possible for existing nurse practitioners to make an application to transition to the scope without conditions. Nurse practitioners who do not wish to do this will continue to practice with a condition on their scope of practice indicating what area they work in. This scope of practice will be accepted at the discretion of the Director-General of Health.

Additionally, all new nurse practitioners from 1 July 2014 are authorised prescribers under the Medicines Act 1981. All non-prescribing nurse practitioners will have this condition on their practising certificate and on the on-line public register.

## List of Submitters

Annette Nesdale (Regional Public Health)

Claire Wong (RN on pilot programme)

Jenny Visser (New Zealand Society of Travel Medicine)

Jill Clendon (Ministry of Health)

Lisa Scotland (RN on pilot programme)

Margot McLean (Hauora Tairāwhiti)

Ryan McLane (Ministry of Health)

Shanika Perera (Auckland Regional Public Health Service)

Tonya Anderson (RN on pilot programme)

Wendy Penno (The Travel Doctor)