



10 June 2011

Caring for Older Australians  
Productivity Commission  
GPO Box 1428  
Canberra City ACT 2601

Dear Sir/Madam,

**Productivity Commission Supplementary Submission – 4.5 Nursing Hours Per Patient Day (NHPPD)**

The purpose of this letter is to provide further clarification to the Productivity Commission on the views of the Australian Nursing Federation (ANF) on minimum staffing levels and skills mix arrangements and which supplement ANF submissions 327, 469 and 772.

Appropriate skills mix and minimum staffing levels arrangements in our view requires residential aged care services to have:

- An adequate number of nurses;
- Appropriate skills mix (proportion of registered nurses to enrolled nurses and nursing assistants);
- Nursing staff who are educationally and clinically prepared;
- A manageable workload for nurses; and
- Efficient resources to enable nursing staff to deliver the best possible care.

We submit that the Productivity Commission should make appropriate final recommendations that require the development and introduction of minimum nursing staffing standards in the residential aged care sector that will ensure a minimum requirement of care for every resident.

We restate our view this should require a guaranteed minimum of 4.5 hours of nursing care per resident per day with this benchmark of 4.5 hours per resident per day to be allocated equally across the registered nurses, enrolled nurse and the nursing assistant workforce at an enterprise level.

In our submission in reply we noted that the introduction of minimum hours of care may require providers to increase overall staffing numbers and this may present some difficulty and should be addressed in a relevant and practical manner.

The industrial and professional organisation for nurses, midwives and assistants in nursing in Australia

**Canberra Office**

Unit 3, 28 Eyre Street Kingston ACT 2604 Australia  
PO Box 4239 Kingston ACT 2604 Australia  
(T) + 61 2 6232 6533 (F) + 61 2 6232 6610  
anfcanberra@anf.org.au

**Melbourne Office**

Level 1, 365 Queen Street Melbourne VIC 3000 Australia  
(T) + 61 3 9602 8500 (F) + 61 3 9602 8567  
anfmelbourne@anf.org.au

**ANF Journals**

Australian Nursing Journal  
Australian Journal of Advanced Nursing  
anj@anf.org.au ajan@anf.org.au  
ABN 41 816 898 298



# australian nursing federation

In the same way, we recognize that there needs to be some flexibility in the skills mix applying to the provision of a nursing care at the facility. This may include consideration of the profile and acuity of the residents and the scope of practice of nursing staff. For example, increasingly enrolled nurses are endorsed to administer medication and this may have an impact on the appropriate mix of registered and enrolled nurses employed at the particular facility.

We believe such matters may be considered in detail in the development of the staff/resident and skill mix tool as part of the Draft Implementation Plan.

We also bring to your attention that the Researching Staffing and Skills Mix in Residential Aged Care Project an initiative of the Federal Government – Budget 2010 has commenced. Please note the position outlined above is our interim position whilst we wait for the outcome of this critical research project.

We trust the foregoing is of assistance to the Commission and please contact me on 03 96028500 should you require further detail on these issues.

Yours sincerely

Yvonne Chaperon  
Assistant Federal Secretary  
Australian Nursing Federation

The industrial and professional organisation for nurses, midwives and assistants in nursing in Australia

**Canberra Office**

Unit 3, 28 Eyre Street Kingston ACT 2604 Australia  
PO Box 4239 Kingston ACT 2604 Australia  
(T) + 61 2 6232 6533 (F) + 61 2 6232 6610  
anfcanberra@anf.org.au

**Melbourne Office**

Level 1, 365 Queen Street Melbourne VIC 3000 Australia  
(T) + 61 3 9602 8500 (F) + 61 3 9602 8567  
anfmelbourne@anf.org.au

**ANF Journals**

Australian Nursing Journal  
Australian Journal of Advanced Nursing  
anj@anf.org.au ajan@anf.org.au  
ABN 41 816 898 298

*As a national body, the ANF Federal Office acknowledges the traditional owners and Elders past and present across Australia, with particular acknowledgment to the Greater Kulin Nation, the traditional owners of the lands where the Melbourne Office is located, and the Ngannawal people, the traditional owners of the land where the Canberra Office is located.*