
For action

Medical Officers of Health

For information

Primary Health Organisations; New Zealand Nurses Organisation; Public Health Units; College of Nurses Aotearoa; Directors of Nursing; Nurse Educators in the Tertiary Sector.

Administration of vaccines by student nurses

Dear Colleagues,

Background

In 2013 the Ministry of Health received requests for clarification of Regulation 44A(2) of the Medicines Regulations 1984 and the Immunisation Handbook in relation to student nurses, on placement in primary and community care settings, administering a scheduled vaccine under the direct supervision of an authorised vaccinator.

In August 2013 guidance from the Ministry of Health (Office of the Chief Nurse and Chief Medical Officer) stated that prescriptions or standing orders are not needed to allow administration of vaccines by student nurses when they are assisting, or working under the direct supervision of, an authorised vaccinator and when every client, environmental and best practice factor is the same as if the authorised vaccinator was administering the vaccine.

Subsequent enquiries addressed to the Ministry have sought clarification of the guidance in relation to registered and enrolled nurses (who are not authorised vaccinators) administering vaccines under the supervision of an authorised vaccinator.

Consequence

Legal advice has been sought and the Ministry concludes the guidance regarding student nurses is a stretched interpretation of the Medicines Regulations which has resulted in ambiguity.

The Ministry acknowledges the needs of student nurses to gain experience in interventions while working in primary and community care, including administering medicines by injection. The Ministry also recognises immunisation events as a continuum of tasks, one of which is the injection of the vaccine. However Regulation 44A does not allow the delegation of administration of the vaccine from the authorised vaccinator to the student nurse. The student nurse (or any nurse who is not an authorised vaccinator), in injecting a vaccine without a prescription or a standing order, runs the risk of being found to have breached section 19 of the Medicines Act and therefore to have committed an offence.

Advice

Compliance with Section 19 of the Medicines Act requires administration of vaccines under a Standing Order or prescription unless it is undertaken by an authorised vaccinator.

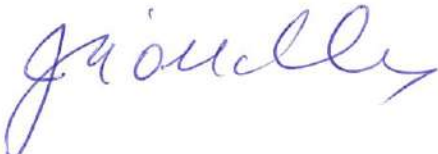
Experience for student nurses on clinical placement

As part of clinical experience while on placement and as preparation for roles as registered nurses in primary care, student nurses need experience observing and assisting with vaccine administration. One solution to enable student nurses to participate in clinical learning opportunities, while working within the Medicines Regulations, is a Standing Order authorising student nurses to administer vaccines while on placement under the direct supervision of an authorised vaccinator. In this case the issuer of the Standing Order must satisfy themselves that:

- the authorised vaccinator covered by the standing order recognises their professional accountability and responsibility to legislation and patient rights, comfort and safety when supervising the student nurse to administer the vaccine
- the authorised vaccinator is competent to assess the skills and knowledge of the student nurse and assure themselves the clinical experience meets the learning needs of student nurse.

Attached is an example Standing Order template which could be used as a guide.

Yours sincerely



Dr Jane O'Malley
Chief Nurse



Dr Don Mackie
Chief Medical Officer

Enquiries to:

Dr Jane O'Malley
Chief Nurse
jane_o'malley@moh.govt.nz

Dr Don Mackie
Chief Medical Officer
don_mackie@moh.govt.nz

Example standing order

Issued: 00/00/0000		Review date: 00/00/0000
Medicine Standing Order Title	Administration of vaccines from the National Immunisation Schedule by undergraduate student nurses on placement, under the supervision of an Authorised Vaccinator.	
Rationale	<p>Any vaccines administered by any person other than an Authorised Vaccinator must be administered under a Standing Order or prescription (Section 44A Medicines Regulations 1984).</p> <p>Student nurses on clinical placement need experiences that will prepare them for the registered nurse role. This includes administration of vaccines in primary health care (administration means all activities related to the immunisation event i.e. assessment, informed consent, communication, providing education and administering the vaccine dose).</p>	
Organisation/clinic	Insert Name of DHB / PHU / PHO / Practice / Clinic	
Scope (the condition and patient group)	<p>Administration of vaccines from the National Immunisation Schedule for the prevention of vaccine preventable diseases in children aged between birth and under 18 years.</p> <p>Administration of vaccines from the immunisation schedule for the prevention of vaccine preventable diseases in adults aged 18 years and over.</p>	
Medicine/s	Vaccines as per the current on-line version of the National Immunisation Schedule	
Dosage instructions for each medicine	Dose as per the current on-line version of the National Immunisation Schedule	
Route of administration	Route as per the current on-line version of the National Immunisation Schedule	
Indication/circumstances for activating the standing order	<ul style="list-style-type: none"> • An undergraduate student nurse on placement is working under the supervision of an Authorised Vaccinator. • The vaccine is scheduled. • Informed consent is achieved. • The authorised vaccinator accepts responsibility for supervising the student nurse to administer the vaccine. 	
Precautions and exclusions that apply to this standing order	<p>Anaphylaxis to a previous dose or any component of the vaccines is an absolute contra indication to further vaccination with that vaccine.</p> <p>See sections 2 and 4 of the on-line Immunisation Handbook for pre vaccination checklists and precautions.</p>	

Persons authorised to administer the standing order	Undergraduate student nurses on placement in the service/practice and working under the supervision of an authorised vaccinator.
Competency/training requirements for the person(s) authorised to administer	<ul style="list-style-type: none"> • Safe administration of oral and injectable vaccines • Basic emergency techniques including resuscitation and treatment of anaphylaxis • Code of Health and Disability Consumer Rights and informed consent process; relevant legislation (Medicines Act; Standing Orders Regulations).
Countersigning and audit	The standing order does not require counter signing. The Standing Order must be included in the monthly audit of 20% of Standing Order treatments in the practice.
Definition of terms used in standing order	<p>National Immunisation Schedule –The schedule issued by the Ministry of Health which stipulates the timing, medicine name, dosage and route for administration of vaccines.</p> <p>Registered nurse – a health practitioner deemed to be registered with the Nursing Council of New Zealand as a practitioner in the profession of nursing.</p> <p>Authorised vaccinator – a registered nurse authorised to administer vaccines under section 44A of the Medicines Regulations (1984).</p> <p>Undergraduate Student nurse – a student enrolled in an approved Bachelor of Nursing programme and on placement for clinical experience as part of that programme.</p>
Additional information	<ul style="list-style-type: none"> • The Authorised Vaccinator supervising the undergraduate student nurse must satisfy themselves that the student is adequately prepared to undertake the administration of the vaccine. • The Authorised Vaccinator is responsible for the supervision and oversight of the student nurse administering a vaccine under this standing order. • The Authorised Vaccinator is responsible for all documentation related to the vaccination event. • This standing order does not apply to any registered nurse working under the supervision of an Authorised Vaccinator. • Any adverse event that occurs in the course of administration of this Standing Order must be reported within 48 hours and investigated as a critical incident.

Signed by issuer:

Name:		Date:	
Title:	Medical practitioner		

Notes: This standing order is not valid after the review date. The review date is one year after the date that the order was signed by the issuer.

The organisational standing order policy and procedure must be signed by management, the issuer and every person operating under standing orders, and attached to the standing order.