

**SUBMISSION TO THE PHARMACY BOARD OF AUSTRALIA**

**REVIEW OF  
GUIDELINES ON PRACTICE-SPECIFIC ISSUES – GUIDELINE 1 REFERENCES**

**PURPOSE**

1. The Pharmaceutical Society of Australia (PSA) makes this submission to the Pharmacy Board of Australia (“the Board”) in response to the consultation on the review of *Guidelines on practice-specific issues – Guideline 1 References*. PSA provides feedback on the Board’s proposals as well as additional comments on a number of specific issues.

**RECOMMENDATIONS**

2. In this submission to the Board, PSA:
- a. agrees with the removal of the asterisk and accompanying text against specific references for pharmacists undertaking medication reviews;
  - b. agrees with the inclusion of additional paragraph text but strongly recommends amendment of the final sentence to ensure pharmacists do not rely on a single source of reference when attempting to access all current and relevant information;
  - c. agrees with the removal of *Martindale: the complete drug reference* from the list of references on therapeutics but suggests it may be a useful recommendation for compounding pharmacists;
  - d. seeks clarification on a number of issues (described in the body of the submission) relating to the listing of a paediatric pharmacopoeia;
  - e. seeks the inclusion of the *Australian Pharmaceutical Formulary and Handbook* as an option under the list of references on complementary and alternate medicines; and
  - f. suggests inclusion of a separate, dedicated text on medicines use in breastfeeding.

**FEEDBACK ON LISTED PROPOSALS**

3. **References used by pharmacists undertaking medication reviews.** PSA understands the Board’s focus on ensuring all references being accessible to all pharmacists undertaking dispensing, clinical assessment, reviewing and counselling processes. We therefore have no objections to the removal of:

- a. the asterisk currently against specific references; and
- b. the accompanying text “for pharmacists undertaking medication reviews”.

4. **Additional text.** The inclusion of the additional paragraph in both the *Guidelines on practice-specific issues* and *Guidelines on practice-specific issues – Guideline 1 (List of References)* is also supported given that it provides advice to pharmacists to:

- a. use references which are appropriate and relevant to the area of practice;

- b. consider information provision in the Australian practice setting; and
- c. ensure all current and relevant information is accessed.

5. However, it is PSA's firm view that the final sentence of the paragraph, "Pharmacists may also need to use more than one reference to ensure that all current and relevant information is accessed" requires modification. Reliance on a single reference source is not regarded as best practice if one is to ensure "all current and relevant information is accessed". Therefore we strongly recommend the beginning of this sentence should be amended to read "Pharmacists should always use more than one reference..." or similar.

6. **Published list of references.** PSA understands the rationale and guidance provided by the Board in relation to references on therapeutics. As such we do not object to the removal of *Martindale: the complete drug reference* from the list of references on therapeutics. However, as the *Martindale* contains stability data, it is suggested that it may be a useful recommendation for compounding pharmacists.

### ADDITIONAL COMMENTS

7. **Paediatric pharmacopoeia.** Under part f of the list of references, it would be useful to have clarification on the following:

- a. is the statement "published by an Australian teaching hospital" necessary;
- b. does a paediatrics manual or handbook meet the Board's requirement eg. the paediatrics manual published by the Children's Hospital at Westmead (by Henry Kilham and co-authors); and
- c. if not, could the *Paediatric Pharmacopoeia*, produced by the Royal Children's Hospital Melbourne and Women's and Children's Health Care Network, be listed by its title?

8. **Reference on complementary and alternate medicines.** Under part g of the list of references, PSA notes that the *Australian Pharmaceutical Formulary and Handbook (APF)* is not listed. The current (21st) edition of APF carries over 50 monographs on complementary medicines with further expansion planned for the next edition (scheduled for release in early 2012). PSA believes the APF provides a greater range of evidence-based monographs than two of the references currently listed (*e-MIMS* and *AusDI Advanced*) and provides information to support pharmacists in practice. PSA therefore strongly urges the Board to consider inclusion of the APF in the list under part g.

9. **Information on medicines in breastfeeding.** While information on the use of medicines in breastfeeding is generally available under individual monographs contained in other references on the list, PSA has received feedback that many pharmacists procure separate texts on 'drugs in breastfeeding' in order to have access to a more comprehensive and consolidated information source on this topic. PSA would suggest that a separate additional entry on the list would therefore be warranted.

### SUMMARY

10. PSA is mostly in agreement with the proposed changes to the Board's guideline on reference texts but also believes additional consideration (as outlined in this submission) would be beneficial.

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