



Communiqué

5 September 2011

The Pharmacy Board of Australia met on 26 August 2011 at the national office of the Australian Health Practitioner Regulation Agency (AHPRA) in Melbourne.

Guidelines on practice-specific issues –Guideline 1 (List of References)

The Board consulted on changes to the list of references in Guideline 1 of the 'Guidelines on practice specific issues'. The guideline outlines that pharmacists must be able to readily access contemporary works of professional reference in either conventional or electronic forms and lists reference works to be made available during the clinical assessment, reviewing, dispensing and counselling processes. Feedback from submissions was considered by the Policies, Codes and Guidelines Committee before finalising its recommendations to the Board for changes to the guideline. Support was received from stakeholders to the proposed changes to the guideline outlined in the published consultation paper.

The changes to in Guideline 1 (List of References) of the 'Guidelines on practice specific issues' approved by the Board are:

- the removal of the asterisk (*) against references which indicated that these were "for pharmacists undertaking medication reviews." The Board removed this statement as it believed it had the potential to cause confusion as the Board intends that all references must be accessible to all pharmacists undertaking clinical assessment, reviewing, dispensing and counselling processes.
- the inclusion of the following additional text in the *Guidelines* and as a note in the list of references published on the Board's website:
"In addition to accessing the references listed in these Guidelines during the clinical assessment, reviewing, dispensing and counselling processes, pharmacists should use additional references relevant to their area of practice. Consideration should also be given to accessing reference material which provides information in the Australian context. Pharmacists may also need to use more than one reference to ensure that all current and relevant information is accessed."
- the following amendments to the list of references:
 - removal of 'Martindale: The Complete Drug Reference' and to require pharmacists to have access to Therapeutic Guidelines Series (complete set in hardcopy), eTG or equivalent
- the following minor amendments to the wording of reference options which do not constitute a change in the references which pharmacists are required to access:

- “a source of current Australian Product Information and Consumer Medicine Information” instead of “a reference work on prescription products”
- “a current paediatric reference available from an Australian source (including a teaching hospital)” instead of “a paediatric pharmacopoeia published by an Australian teaching hospital
- “The Australian Immunisation Handbook” instead of “Immunisation Handbook”.

Whilst ‘Martindale: The Complete Drug Reference’ was considered by a number of stakeholders to be a valuable reference, most the feedback received suggested that a pharmacists might choose to keep this reference depending on their area of practice. The Board requested its Compounding Working Party to consider this reference when considering the broader issue of suitable reference works required by pharmacists involved in compounding.

The Board received additional suggestions for changes to the guideline in submissions from some stakeholders. The Board agreed that issues raised by those stakeholders, which were not outlined in the original consultation document, should be considered as part of the next scheduled consultation to ensure that all stakeholders have the opportunity to comment on all possible changes. The Board thanks all stakeholders who provided feedback during the consultation process. All submissions can be accessed on the Board’s website at www.pharmacyboard.gov.au/News/Past-Consultations.aspx. The revised Guideline 1 (List of References) of the ‘Guidelines on practice specific issues’ is published on the Board’s website www.pharmacyboard.gov.au/Codes-Guidelines.aspx and pharmacists are advised to refer the guideline and assess their ability to access these references during practice.

Clarification on registration type required by proprietors of pharmacies

The Board agreed the following policy to clarify the registration type required by proprietors of pharmacies:

Regulation of pharmacy ownership

The Health Practitioner Regulation National Law Act (the National Law) as in force in each state and territory outlines the provisions for the various types of registration of pharmacists. Ownership of pharmacies is regulated by separate legislation or under specific provisions in the National Law of a particular jurisdiction, and may specify the type of registration a pharmacist must hold in order to own a pharmacy business.

The Board’s policy – ‘a pharmacist who owns a pharmacy is practising pharmacy’

It is the Board’s view that it is in the public interest for proprietor pharmacists to hold general registration as it believes there may be greater risk in meeting their obligations outlined in its ‘Guidelines on responsibilities of pharmacists when practising as proprietors’ whilst holding non-practising registration. However, the Board acknowledges that it must take into consideration, whether under state and territory legislation governing pharmacy ownership, pharmacists are entitled to maintain non-practising registration whilst remaining proprietors of pharmacies in the jurisdiction where the pharmacy premises is located. Regardless of registration type, ongoing compliance with the requirements of the National Law, including all relevant registration standards and guidelines must be ensured.

Current Status

ACT	proprietors must hold general registration
New South Wales	proprietors must hold general registration
Northern Territory	TBA
Queensland	TBA
South Australia	proprietors may hold general or non-practising registration
Tasmania	proprietors must hold general registration
Victoria	proprietors may hold general or non-practising registration
Western Australia	TBA

The above policy will be updated as further information from the relevant pharmacy approval authorities is confirmed. The policy document can be accessed by downloading the 'Guidelines on responsibilities of pharmacists when practising as proprietors' from the Board's website at www.pharmacyboard.gov.au/Codes-Guidelines.aspx.

Dispensing PBS prescriptions at pharmacies not approved to dispense pharmaceutical benefits

In January 2011, the Board advised that it developed a policy to address the issue of supply of medications from pharmacies not approved to dispense pharmaceutical benefits. The National Health Act 1953 and the National Health (Pharmaceutical Benefits) Regulations dictate that only pharmacists practising at "approved" pharmacies can supply pharmaceutical benefits.

The Board proposes to address this issue by working collaboratively with stakeholders including the Pharmaceutical Benefits Division of the Department of Health and Ageing and state and territory pharmacy approval authorities. The Board is interested to ensure that suitable information regarding permitted medication supply arrangements is displayed at pharmacies which are not approved to supply pharmaceutical benefits ("unapproved" pharmacies) although licensed under relevant state/territory laws and regulations as pharmacies. The Board will advise further as this work progresses.

Reports have been received alleging that medications are dispensed at an approved pharmacy and supplied by a different pharmacist at an "unapproved" pharmacy without the patient being aware of this supply arrangement. The Board is concerned about reports of alleged supply of pharmaceutical benefits from "unapproved" pharmacies where patients were not fully aware of the supply arrangements and the consequences such as payments made for prescriptions not contributing to PBS Safety Net Records. One of the primary roles of the Board under the Health Practitioner Regulation National Law Act (the National Law) as in force in each state and territory is to oversee the receipt, assessment and investigation of notifications about pharmacists registered under the National Law. Any supply arrangements which infringe on patient rights or put the patient at risk and which may result in a poor health outcome (for instance by not providing an opportunity for adequate communication of essential information between patient and pharmacist), may be grounds for investigation and action by the Board under the National Law.

Continuing professional development (CPD)

The Board's 'Continuing professional development registration standard' introduced on 1 July 2010 outlines that pharmacists who have general, provisional or limited registration are required to complete 20 CPD credits for the period ending 30 September 2011. As the conclusion of the first auditable period for CPD is nearing, pharmacists are reminded to ensure that records of CPD undertaken during the previous 12 months (1 October 2010 – 30

September 2011) must meet the requirements set out in the Board's 'Guidelines on continuing professional development.'

A declaration of compliance with the CPD registration standard must be completed by pharmacists applying to renew their general registration by 30 November 2011. Whilst pharmacists renewing registration are not required to submit CPD records when lodging their on-line or hardcopy application, CPD records will need to be provided subsequently if selected for audit. If selected for audit, will your CPD records enable you to adequately demonstrate your participation in CPD consistent with the Board's CPD registration standard and guidelines?

Many practitioners continue to undertake accredited CPD and maintain their records through the providers of accredited CPD. The Board has previously confirmed that this satisfies the requirements of the Board's CPD guidelines. Other practitioners are seeking alternative forms of (non-accredited) CPD activities as part of a self directed learning plan. As outlined in the CPD guidelines, detailed records of non-accredited activities must be maintained. Pharmacists should refer to the Board's CPD guidelines at www.pharmacyboard.gov.au/Codes-Guidelines.aspx.

Renewal of registration

Renewal of registration is due on 30 November 2011 and in September AHPRA will commence communication with registrants about the renewal process. You will be able to renew registration, complete the workforce survey, update your contact details and check your registration status through AHPRA's Online Services. To assist AHPRA to effectively manage the registration process, please ensure that your contact details including e-mail address are up-to-date. Go to www.ahpra.gov.au/login.aspx and use your AHPRA user ID and pass code to log in to update your details. If you do not have your user ID, go to www.ahpra.gov.au/About-AHPRA/Contact-Us.aspx to complete an online enquiry. Select user ID as the enquiry type and you will be contacted with your user ID and password.

William Kelly
Acting Chair
5 September 2011