



## Public consultation on the draft *Guidelines on compounding of medicines*

28 April 2014

### Responses to consultation questions

Please provide your feedback as a Word document (or equivalent)<sup>1</sup> to [pharmacyconsultation@ahpra.gov.au](mailto:pharmacyconsultation@ahpra.gov.au) by close of business on Monday 30 June 2014.

#### Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate word document (not PDF).

<b>Organisation name</b>
The Pharmacy Guild of Australia
<b>Contact information</b> <i>(please include contact person's name and email address)</i>
<b>Contact officer:</b> Claire Bekema Pharmacist Consultant Quality Pharmacy Practice Pharmacy Transformation Group [REDACTED]

#### Your responses to consultation questions on the draft *Guidelines on compounding of medicines*

1. Do the draft guidelines clearly differentiate between simple compounding and complex compounding?
Yes.
2. Do the draft guidelines clearly outline which requirements apply to pharmacists who undertake either or both types of compounding (simple and/or complex compounding), and which requirements apply only to pharmacists who undertake complex compounding?
The draft guidelines do not clearly define which requirements apply to either or both types of compounding. Sections 1 and 2 provide the differentiation between simple and complex, but all other sections are assumed to apply to both types of compounding.

<sup>1</sup> You are welcome to supply a PDF file of your feedback in addition to the word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and National Boards are striving to publish documents in accessible formats (such as word), in addition to PDFs. More information about this is available at [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx).

A part where this may need to be defined, is 'manipulation of products in accordance with manufacturer's instructions' where individual dispensing forms would create an added burden for pharmacists to keep for every compounding of a product into 'ready-to-administer' form, such as paediatric antibiotic mixtures.

3. Is the content of the draft guidelines helpful?

Yes

4. Is there any content that needs to be changed, added or deleted in the draft guidelines?

The guidelines state:

"A compounded medicine should be prepared only:

- **in circumstances where an appropriate commercial product is unavailable or unsuitable;** and
- if the pharmacist and other staff involved have completed education and training in the types of compounding they undertake, and have demonstrated competence in the relevant compounding techniques.

**A commercial product may be considered unsuitable for a particular patient if an allergy to an excipient in the commercial product was experienced"**

The Guild recommends more clarity of the definition of 'unsuitable' as allergy may not be the only reason a commercial product is unsuitable and needs compounding. For example, compounding of omeprazole mixtures for neonates with naso-gastric tubes, intolerance to excipients such as lactose, compounding of mixtures for patients with swallowing difficulties. Section 19 in the Draft *Professional practice profile for pharmacists undertaking complex compounding* is more comprehensive.

See additional Guild paper for further information.

5. Do you have any suggestions for questions to be answered in Frequently Asked Questions developed by the Board to support the guidelines?

Suggested FAQs

- What is the difference between Simple vs Complex compounding?
- When do I have to keep batch records/dispensing worksheet?
- Can a dispensary technician compound?

6. Is the purpose of the practice profile clearly explained in the draft guidelines?

Yes. The practice profile gives good examples of how this specific area of practice maps to the National Competency Standards Framework. This document will be helpful for training providers to structure their training to ensure these standards are addressed.

7. Do you have any other comments on the draft guidelines?

See additional Guild paper for further information.

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