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)[1] to 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).

Organisation name
Pharmacy Regulation Authority SA (PRASA)
Contact information *(please include contact person's name and email address)*
Peter Halstead [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?
It is extremely difficult to provide absolute clarity with regard to the differentiation. This document provides guidance as it should, as well as leaving an opportunity for interpretation (and therefore ambiguity). Using the guidelines and then working through matters of concern that will no doubt arise prvides the opportunity for further clarity which is a common sense approach. To have been any more prescriptive could well have caused issues around practicality.
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?

[1] 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.

Yes
3. Is the content of the draft guidelines helpful?
The guidelines provide a level of guidance and clarity that presently is absent. The only concern will be how the guidelines fit with any proposed measures that the Therapeutic Goods Administration intends to progress. However, it is assumed that some level of communication will be underway and at least consideration is being applied to a structured approach from all perspectives.
4. Is there any content that needs to be changed, added or deleted in the draft guidelines?
Bearing in mind the nature of the organisation providing these comments it would not be surprising that the Pharmacy Regulation Authority SA (PRASA) suggests that consideration be applied to greater formalisation of the measures determining the competency of practitioners choosing to undertake complex compounding. Much of the guidance provided for determining competence revolves around personal reflection and undertaking relevant CPD activities (which may involve a training program). Given the risks associated with the professional activity of complex compounding PRASA considers it essential that all practitioners successfully complete a suitable training program as determined by the Pharmacy Board of Australia.
5. Do you have any suggestions for questions to be answered in Frequently Asked Questions developed by the Board to support the guidelines?
No
6. Is the purpose of the practice profile clearly explained in the draft guidelines?
Yes
7. Do you have any other comments on the draft guidelines?
The need for guidelines in this area of practice is critical and these guidelines represent a very suitable initial measure. As is the case with all initial measures there will be a need for vigorous and thorough evaluation of their effectiveness and applicability moving forward.

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