



Public consultation on draft revised registration standards and related guidelines

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
The Australian Pharmacy Council
Contact information <i>(please include contact person's name and email address)</i>
Bronwyn Clark Chief Executive Officer Australian Pharmacy Council Ltd PO Box 269 CIVIC SQUARE ACT 2608 [REDACTED] [REDACTED]

Your responses to consultation questions on the draft revised standards and related guidelines

Registration standard: Professional indemnity insurance arrangements <i>Please provide your responses to any or all questions in the blank boxes below</i>
1. From your perspective how is the current Professional indemnity insurance (PII) arrangements registration standard working?
2. Is the content and structure of the draft revised Registration standard: PII arrangements helpful, clear, relevant and more workable than the current standard?

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.

Registration standard: Professional indemnity insurance arrangements	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
3.	Is there any content that needs to be changed or deleted in the draft revised Registration standard: PII arrangements?
4.	Is there anything missing that needs to be added to the draft revised Registration standard: PII arrangements?
5.	Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
6.	Do you have any other comments on the draft revised Registration standard: PII arrangements?

Registration standard: Continuing professional development (CPD)	
<i>Please provide your responses to any or all questions in the blank boxes below</i>	
7.	From your perspective how is the current CPD registration standard working?
Current CPD registration standard of mandatory CPD tend to focus on quantity, not quality and risks being a simple tick-box exercise with no demonstrable benefit for the pharmacists engaging with it. Pharmacists may undertake CPD not relevant to their scope of practice simply to achieve their annual CPD requirement.	
8.	Is the content and structure of the draft revised Registration standard: CPD helpful, clear, relevant and more workable than the current standard?
The draft revised Registration Standard for CPD has a better layout than the previous standard. It is also explained in layman's term outlining what it means to individual pharmacists. Setting out of the standards in such a way will help pharmacists to clearly understand what is required of them.	
9.	Is there any content that needs to be changed or deleted in the draft revised Registration standard: CPD?
No	
10.	Is there anything missing that needs to be added to the draft revised Registration standard: CPD?
No	
11.	Is the proposed requirement for pharmacists to maintain CPD records for a minimum of three years appropriate? Would an alternative period be considered more appropriate, for example five years?
Proposed requirement for pharmacists to maintain CPD records for a minimum of three years is considered appropriate.	

Registration standard: Continuing professional development (CPD) <i>Please provide your responses to any or all questions in the blank boxes below</i>
12. Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?
Proposed review period of five years appears to be too long. Since the current system of CPD is still relatively new to the pharmacy profession it is recommended that the Standards be reviewed every 3 years.
13. Do you have any other comments on the draft revised Registration standard: CPD?
Nil

Guidelines on continuing professional development (CPD) <i>Please provide your responses to any or all questions in the blank boxes below</i>
14. From your perspective how are the current guidelines on CPD working?
Current Guidelines are quite helpful and assists in the interpretation of the current CPD Standard.
15. Is the content and structure of the draft revised guidelines on CPD helpful, clear, relevant and more workable than the current guidelines?
The draft revised Guidelines for CPD has a better layout than the previous guidelines. It is also explained in layman's term outlining what it means to individual pharmacists. Setting out of the guidelines in such a way will help pharmacists to clearly understand what is required of them.
16. Is there any content that needs to be changed or deleted in the draft revised guidelines on CPD?
No
17. Should the Board change the limitation in relation to the percentage of Group 1 activities that can be claimed as part of the annual CPD credits requirement (now rephrased to state the minimum amount of Group 2 and Group 3 activities to be undertaken by pharmacists)? If so, what should this be changed to and why?
No
18. Should the Board introduce a specific minimum requirement for Group 3 activities? If you believe the Board should, what should the minimum amount or proportion be? Please provide further information which explains how this could be achieved by pharmacists in all areas of practice.
It is recommended that the Board introduce a specific minimum requirement for Group 3 activities as this is one way to introduce the concept of converting education into practice. Since this will be novel to most pharmacists, the APC recommends a gradual approach in introducing the requirement. It is recommended that at least ONE of the activities from their annual CPD record to be a Group 3 activity.
The proposal to require development of CPD learning plans through the CPD Registration Standards should support pharmacists to undertake educational activities that are only relevant to their area of practice. Therefore, undertaking CPD activities which are specific to their area of practice will assist pharmacists to provide evidence as to how professional development activities have led to practice change.
It is also recommended that the Board provide guidance document and a sample reflection tool for Group 3 activities alongside with sample learning plans (refer to question 20 below) to pharmacists to assist them with meeting this requirement.
19. Are the definitions for CPD activity groups (Groups 1, 2 and 3) satisfactory? If not, what requires

Guidelines on continuing professional development (CPD)

Please provide your responses to any or all questions in the blank boxes below

further clarification, and what are your recommendations?

Definitions for CPD activity groups are satisfactory.

20. Is there anything missing that needs to be added to the draft revised guidelines on CPD?

The draft revised Guidelines on CPD discusses the development of continuing professional development plans but does not provide sufficient information for pharmacists on how they should be developed, what sort of information should be included and examples of learning plans. Since the concept of mandatory learning plans is quite novel it is recommended that the Board provide more guidance in this area either through the Guidelines or a supplementary document.

21. Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?

Proposed review period of five years appears to be too long. Since the current system of CPD is only new to the pharmacy profession it is recommended that the Guidelines are reviewed every 3 years.

22. Do you have any other comments on the draft revised guidelines on CPD?

Nil

Registration standard: Recency of practice (ROP)

Please provide your responses to any or all questions in the blank boxes below

23. From your perspective how is the current ROP registration standard working?

24. Is the content and structure of the draft revised Registration standard: ROP helpful, clear, relevant and more workable than the current standard?

25. Is there any content that needs to be changed or deleted in the draft revised Registration standard: ROP?

26. Is there anything missing that needs to be added to the draft revised Registration standard: ROP?

27. Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?

28. Do you have any other comments on the draft revised Registration standard: ROP?

Registration standard: Recency of practice (ROP)

Please provide your responses to any or all questions in the blank boxes below

Registration standard: Supervised practice arrangements

Please provide your responses to any or all questions in the blank boxes below

29. From your perspective how is the current Supervised practice arrangements registration standard working?

30. Is the content and structure of the draft revised Registration standard: Supervised practice arrangements helpful, clear, relevant and more workable than the current standard?

31. Is there any content that needs to be changed or deleted in the draft revised Registration standard: Supervised practice arrangements?

32. Is there anything missing that needs to be added to the draft revised Registration standard: Supervised practice arrangements?

33. Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?

34. Do you have any other comments on the draft revised Registration standard: Supervised practice arrangements?

Registration standard: Examinations for eligibility for general registration

Please provide your responses to any or all questions in the blank boxes below

35. From your perspective how is the current Examinations for general registration standard working?

36. Is the content and structure of the draft revised Registration standard: Examinations for eligibility for general registration helpful, clear, relevant and more workable than the current standard?

37. Is there any content that needs to be changed or deleted in the draft revised Registration standard: Examinations for eligibility for general registration?

38. Is there anything missing that needs to be added to the draft revised Registration standard: Examinations for eligibility for general registration?

Registration standard: Examinations for eligibility for general registration

Please provide your responses to any or all questions in the blank boxes below

39. Do you think that the proposed review period of five years, with the option to review earlier if the need arises, is appropriate?

40. Do you have any other comments on the draft revised Registration standard: Examinations for eligibility for general registration?

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