



GUIDELINES AND PROCEDURES FOR ACCREDITATION

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The APC Guidelines and Procedures for Accreditation Version 1.0 July 2009 replaces the NAPSAC Guidelines and Procedures for Accreditation Version 4.0 of 2007.

The revised Guidelines and Procedures for Accreditation should be read in conjunction with the APC Accreditation Standards Version 1.0 July 2009 and the APC Accreditation Application Pro forma Version 1.0 July 2009 when making application for accreditation.

Note: previous versions of all documents were headed under the NAPSAC banner. For consistency and clarity all new versions of documents under the APC banner have reverted back to versions 1.0.

Pharmacy programs in Australia and New Zealand exist in several different ways such as programs run directly by faculties, schools or departments. In the interests of uniformity, all are referred to in this document as "Schools of Pharmacy" irrespective of differences that may exist within individual university organisational structures.

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1. Introduction

Purpose of accreditation by APC

All State and Territory Pharmacy Acts are intended to protect public safety by ensuring health care is delivered by pharmacists in a professional, safe and competent manner. All registering authorities require new pharmacy registrants to have successfully completed a recognised pharmacy program and a period of intern training.

Mutual recognition legislation, which requires that a pharmacist registered in one jurisdiction be accepted for registration in another, compels comparable educational standards in all jurisdictions.

The APC accreditation process provides assurance to the registering authorities, the profession and the public that standards for pharmacy education are being evaluated rigorously across Australia and New Zealand.

APC guidelines and procedures have been benchmarked to ensure that they are in line with world best standards. The national and international organizations referenced to in developing APC guidelines and procedures include the following:

1. The World Health Organisation (WHO)
2. The International Pharmaceutical Federation (FIP) and its International Forum for Quality Assurance for Pharmacy Education
3. Similar pharmacy education accreditation bodies worldwide including those in the USA (ACPE), Canada (CCAPP) and in the UK (RPSGB)
4. Health education accreditation bodies in Australia including the AMC (medicine), APC (Physiotherapy), ADC (dental), ANMC (nursing and midwifery), OCANZ (optometry), ACORB (osteopath), APAC (psychology) and the CCEA (chiropractic)
5. Other groups such as the Committee of Heads of Pharmacy Schools of Australian and New Zealand (CHPSANZ), the Higher Education Council of Australia (HEC), the World Federation for Medical Education and the European Association of Faculties of Pharmacy

APC accreditation criteria and procedures also provide the basis for judgments made by pharmacy registration and other authorities in other countries on the quality of pharmacy education in Australia and New Zealand.

Committees and groups involved in the accreditation process

Australian Pharmacy Council (APC)

APC is the body responsible for determining and administering accreditation procedures for pharmacy undergraduate education. It receives recommendations from the Accreditation Committee and makes the final decisions regarding accreditation. The Council's members are the pharmacy registering authorities of each Australian State and Territory. The Pharmacy Council of New Zealand is an Associate member. The Committee of Heads of Pharmacy Schools Australia and New Zealand (CHPSANZ) has affiliate membership.

Accreditation Committee

This is a standing committee of APC responsible for development of Accreditation Standards and procedures and for considering accreditation applications. Committee members include: pharmacy professionals, pharmacy academics, community and student representatives and two APC Council representatives.

Role of the Accreditation Committee

The role of the Accreditation Committee is to act on behalf of APC to evaluate each pharmacy school and its course(s). It considers the curriculum and educational delivery as specified in the *Accreditation Standards* assuring that graduates meet the expectations of pharmacy education.

Pharmacy graduates are expected to have the knowledge, skills and attributes which enable them to:

- commence practice safely and effectively under the supervision of a preceptor in their intern training year;
- after a period of supervised practice and additional experiential training, practice safely and effectively without supervision in community and hospital pharmacy settings;
- practice in a manner which meets the needs of all patients including those from culturally diverse backgrounds

The expected educational outcomes are detailed in the *Accreditation Standards*.

A school satisfying the *Accreditation Standards* will have the processes, resources and expertise necessary for effective self-review and appropriate response. Pharmacy schools are best placed to assess their own strengths and weaknesses and to develop strategies to address weaknesses. APC requirement that schools provide periodic reports on action undertaken to address matters of concern allows the Committee to monitor progress in the periods between accreditation reviews.

Accreditation and higher education quality assurance

Quality assurance has become an essential feature of higher education in Australia and New Zealand.

In Australia, universities are accredited by Commonwealth education agencies. The universities self-accredit their courses. Consistent with this notion of self-accreditation, universities have established internal quality processes involving self-review and external review of courses and departments on regular cycles.

The Australian Universities Quality Agency (AUQA) was established in 2000 to provide public assurance of the quality of Australian universities by means of quality audits. AUQA bases its audits on a critical self-review and is interested in processes and outcomes (measured against the institutions' own objectives). Because of the breadth of scope of a university, AUQA does not attempt to give detailed consideration to every course.

In New Zealand, the Committee on University Academic Programs (CUAP) is a standing committee of the New Zealand University Vice-Chancellors' Committee (NZVCC) and represents the interests of New Zealand's eight universities. For any new program proposed the CUAP and the Pharmacy Council of New Zealand (PCNZ) approval requirements must be satisfied.

APC regards the Accreditation Committee's role as integral to the higher education quality framework. It expects pharmacy schools to have in place mechanisms for self review consistent with universities' quality frameworks. Nevertheless, APC reserves the right to ensure that it is able to conduct its reviews in a manner which allows it to inquire into any aspects of pharmacy schools and to make independent recommendations and conclusions.

APC accreditation is designed to satisfy the Higher Education Council's criteria for a 'good practice' course review and accreditation process¹; which:

- includes all stakeholders;
- is open, consultative and consensus building about future course developments;
- is transparent to all parties;
- as far as possible meshes the external registration requirements and public safety aspects with internal academic priorities;
- monitors implementation of recommended changes after the accreditation of the course is approved;
- involves an ongoing cycle of review; and
- is focused on the achievement of objectives, maintenance of academic standards, public safety requirements, and good outputs and outcomes rather than detailed specification of curriculum content.

¹ Professional Education and Credentialism, Higher Education Council, December 1996, AGPS, Canberra.

2. Grades of Accreditation

APC grants accreditation to a pharmacy school² following evidence that graduates of a pharmacy course provided by that school possess the necessary knowledge, skills and attributes. Because accreditation is prospective, APC must also satisfy itself that the requisite standard of educational quality will be maintained for the period of accreditation.

In the interests of consistency, transparency and valid decision making, it bases that evidence on evaluation against the Accreditation Standards concerning both the course and its delivery. As such, evaluation is of the course and the school in which it is delivered. Institutions may now offer more than one pharmacy course (Bachelor or graduate entry Master levels) or the course(s) may be offered at more than one campus, with differences in curriculum, delivery and teaching staff. These guidelines introduce greater specificity to the granting of accreditation and make clear the status of new schools and their on-going review pending demonstration of their graduates' success in practice.

APC is of the view that the overall quality of a pharmacy school is the primary determinant of graduate quality. The quality is determined in large part by institutions having the infrastructure and the culture to self-evaluate the capacity of their pharmacy courses to meet evolving professional standards and requirements, and the resources and institutional support to implement necessary changes. However, accreditation is granted only in respect of those eligible courses evaluated as part of the accreditation review. An accredited school must apply for accreditation of new courses intended to lead to entry into intern training programs and must make available to prospective students the accreditation status of such courses.

Preliminary approval

Preliminary approval is granted to a new school or an already accredited school offering a new pharmacy course after successful initial evaluation of the capacity of the course and the school offering it to meet the Accreditation Standards. Preliminary approval is normally granted prior to, or commensurate with, the entry of the school's first students into the course.

Provisional Accreditation

Provisional accreditation is granted to a Preliminary Approved school after successful review of the performance of the school in terms of its ability to achieve the Accreditation Standards, usually after its first year of teaching. Provisional accreditation will continue until a school is able to achieve full accreditation.

Full Accreditation

Full accreditation may be granted for a period of up to five years for established schools. A new school having Provisional Accreditation is eligible to apply for full accreditation after the first cohort of graduates of the pharmacy program have had twelve months experience as registered pharmacists (ie two years after graduation).

3. Accreditation procedures for new schools or courses

There are three stages of accreditation for new schools or for established schools offering new courses. These are Preliminary Approval, Provisional Accreditation and Full Accreditation. For new schools the accreditation process begins prior to the enrolment of the

² A 'pharmacy school' may be an autonomous faculty or school of pharmacy. It may also be a school of health sciences or similar, which provides a pharmacy course within a departmental or multidisciplinary organisational structure.

first cohort of students and for those offering a typical 4 year BPharm course they should achieve full accreditation after 7 years. Those offering a 2 year MPharm course should achieve full accreditation after 5 years.

The procedures for the three stages of accreditation for new schools or courses are as follows.

3.1 Preliminary Approval

For a University which has not previously offered a registrable pharmacy qualification and intends to offer a pharmacy course for the first time, an application for **preliminary approval** must be made prior to the course being advertised to prospective students. This should be undertaken at least twelve months prior to the enrolment of the first cohort of students. Established schools intending to introduce new or additional courses should undertake the application process at least six months prior to the first enrolments.

Applicants must provide the information specified in the *Accreditation Application Proforma* and forward three copies and the application fee (as outlined on the APC website). The submission is handled in accordance with APC's confidentiality and disclosure provisions.

APC recognises that the information which it seeks may have been already documented in internal submissions for course approval and these should be submitted on the proviso that each item specified in the pro forma is referenced in the submission.

The Accreditation Manager examines the application for completeness. If it is not complete or payments are not made, the applicant is advised accordingly. Payments are non refundable should an applicant decide not to proceed.

The application is evaluated on behalf of the APC by two independent academic reviewers who make recommendations to the Accreditation Committee. Dependent on recommendation(s) the Accreditation Committee may require additional information or may conduct a site visit where it is necessary to make a decision.

On achieving Preliminary Approval the school must inform the public of its status in the following terms:

'The Australian Pharmacy Council (APC) has granted preliminary approval for the [School or University] to offer its [course name] as a qualification intended to lead to becoming a pharmacist in Australia and New Zealand. Recognition of the [course name] as an appropriate qualification is subject to the granting of provisional accreditation. The [School or University] becomes eligible to apply for provisional accreditation in [date]' (optional final sentence).

Note 1: *any new pharmacy school or new pharmacy program within an established school **must not advertise** a pharmacy course or give the impression that it will lead to a qualification which entitles graduates to enter an intern training program (subsequent to becoming a Registered Pharmacist) until such a program has been granted Preliminary Approval by the APC.*

Note 2: *Preliminary Approval will only be granted prospectively and should a pharmacy school and/or University proceed with the introduction of a course before approval is granted, the APC expects that students who enroll in such circumstances will be advised that the pharmacy course is not accredited.*

3.2 Provisional Accreditation

Following 12 months of teaching the school is required to make application for Provisional Accreditation. A site visit is mandatory for new schools if none was conducted at the preliminary approval stage: this includes all steps as outlined in section 4 of this document.

If a site visit was conducted during the Preliminary Approval stage for new schools the Accreditation Committee will determine the form of review for the Provisional Accreditation application having regard to individual circumstances. Review may take the form of:

- Committee consideration of the application alone and/or;
- paper evaluation of the application by two external academics
- a repeat site visit by one or two committee members, or delegates of the Committee, or a designated site evaluation team to discuss matters of concern where the Committee concludes that this is necessary to make a decision.

For established schools that have obtained Preliminary Approval for new or additional courses and are applying for Provisional Accreditation this will usually only involve a paper evaluation of the submitted application by two external academics

Provisional accreditation may be subject to annual reporting requirements or to the satisfaction of other conditions. On achieving Provisional Accreditation the school must inform the public of its status in the following terms:

'The [School or University] and its [course name] are provisionally accredited by the Australian Pharmacy Council (APC). The [School or University] becomes eligible to apply for full accreditation in [date]' (optional final sentence).

Note: the APC resolved in November 2006 that all pharmacy students must graduate from a school that has achieved Provisional Accreditation status as a requirement for entry into an intern training program.

3.3 Full Accreditation

When the first cohort of graduates have worked as registered pharmacists for a period of 12 months (12 months following their intern training year) the school may then make application for full accreditation.

Normally the procedures for new schools applying for full accreditation are similar to the procedures for established schools applying for full re-accreditation - outlined in section 4 of this document.

However, dependent on any conditional requirements arising from Provisional Accreditation and/or length of time since the last site visit a full accreditation application may take the form of:

- Committee consideration of the application alone and/or;
- paper evaluation of the application by two external academics
- a repeat site visit by one or two committee members, or delegates of the Committee, or a designated site evaluation team to discuss matters of concern where the Committee concludes that this is necessary to make a decision.

On achieving Full Accreditation the school must inform the public of its status in the following terms:

| |
|---|
| 'The [School or University] and its [course name] are accredited by the Australian Pharmacy Council (APC)'. |
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The steps, procedures and timelines for accreditation processes for new schools are summarized in the table below

Accreditation process for new schools

| Step | Procedure | Timeline |
|------|--|---|
| 1 | Notification by prospective school to APC | 12 months prior to planned first enrolments |
| 2 | Submission of Preliminary Approval pro-forma application | 6 - 9 months prior to enrolment date |
| 3 | Assessment of application by external reviewers | 3 – 6 months prior to enrolment date |
| | | <i>Where a site evaluation visit has been recommended by external reviewers the process from this point is similar to the accreditation process for established schools outlined in section 4 of this document; otherwise the application proceeds to step 4 below</i> |
| 4 | Consideration by Accreditation Committee | External review report submitted to Accreditation Committee. Meetings held in April and September each year, otherwise considered out-of-session |
| 5 | Recommendations to Council | Submitted to Council meetings held in May and November each year, otherwise considered out-of-session |
| 6 | Notification of accreditation decision | Following Council approval schools are formally notified and APC website is updated to reflect the schools current accreditation status |
| 7 | Notification to School regarding requirement for Provisional Accreditation application | 6 – 9 months prior to end of first year of teaching. Where a site evaluation visit was not conducted during the Preliminary Approval stage the Provisional Accreditation process from this point is similar to the accreditation process for established schools outlined in section 4 of this document. The visit should take place before the end of the first year of teaching |
| 9 | Notification to School regarding Full Accreditation application | Application for Full Accreditation is made two years after the first cohort of students have graduated and is similar to the accreditation process for established schools outlined in section 4 of this document. A repeat site visit is dependent on any conditional requirements arising from the Preliminary Approval and/or Provisional Accreditation stages |

Note: Where a school may have more than one pharmacy course, site evaluation visits will be synchronised where possible to avoid unnecessary duplication of effort

4. Accreditation procedures for established schools

Note: The following procedures apply to established schools but may also apply to new schools where it has been determined that a site evaluation visit should take place.

4.1 Notification to schools by APC

Pharmacy schools will receive notification 12 months prior to expiry of current accreditation period for the relevant program.

4.2 Submission of pro-forma application

Applicants should download a word version of the Application Pro-forma from the APC website located under the Accreditation tab. Associated documents are the Accreditation Standards and Guidelines and Procedures for Accreditation documents that should be referenced to complete the application.

The pro-forma outlines the standards that are to be addressed and provides information regarding relevant documentation to be submitted. The application is partially prescriptive providing tables for the collation of statistical, financial and other data. There is provision for schools to self-assess also.

Universities must submit the application pro-forma not less than 3 months before any expiry date and/or scheduled site visit.

4.3 Selection of site evaluation team (SET) members

The APC establishes a Site Evaluation Team (SET) for accreditations involving a site visit. A SET normally consists of three to four suitably qualified people with experience in the organisation and structure of undergraduate pharmacy courses and with an understanding of the current professional requirements for practice. It includes:

- 1 - A university academic who is team leader; and
- 2 - Two or more members with appropriate knowledge of current pharmacy practice

Members are selected on the basis of the individual expert contribution they bring to the SET those that also have affiliation with pharmacy organisations within the jurisdiction where the school or program being assessed is located are encouraged. As such, they provide broader stakeholder input.

Approximately six months prior to a scheduled site visit the Accreditation Manager will provide a list of suitable university academics (from schools irrespective of accreditation status of that school) and community and hospital pharmacy representatives for consideration and approval by the Accreditation Committee.

The nominated SET team will be communicated to the Vice-Chancellor and the school to seek their approval of the final composition of the SET team, review date and to begin making arrangements for the site visit.

The Accreditation Manager participates in SET reviews by providing orientation for the SET team prior to the site visit, also by assisting the University in resolving scheduling issues during the visit and by being on-hand to provide advice to the SET team and the University regarding accreditation procedures.

Note: Assessments of accreditation applications not involving a site visit will be undertaken by external academic evaluators who are selected in consultation with the chairs of the Accreditation Committee and CHPSANZ.

4.4 Submissions by pharmacy profession stakeholders

Not less than two months before the site visit, APC will give notice of the impending accreditation review and invite written submissions to be considered by the SET team.

Universities must take appropriate steps to ensure that the invitation comes to the attention of interested students and staff. In the case of Australian universities, APC will forward the notice to the relevant State or Territory branches of the Pharmaceutical Society of Australia, the Society of Hospital Pharmacists of Australia, the Pharmacy Guild of Australia, the Pharmacy Division of APESMA; and to the university's student association. In the case of New Zealand universities, APC will forward the notice to the Pharmaceutical Society of New Zealand, the New Zealand HealthCare Pharmacists' Association, the Pharmacy Guild of New Zealand; and to the university's student association.

Written submissions will be received at any time prior to the commencement of the site visit. All submissions may be made available to Accreditation Committee members, and the head of school, as appropriate. Contents of submission marked confidential will not be disclosed to other than those persons. The SET will not generally hear oral submissions but in exceptional cases this may be considered. In such cases, the person will be expected to make himself/herself available at a time and place convenient to the SET.

4.5 Site visit schedule

Not less than one month from the site visit date the Accreditation Manager will in consultation with senior pharmacy school staff develop a visit schedule. It is the school's responsibility to ensure that all relevant staff and students are aware of the visit and are available for consultation with the SET.

The site visit schedule should provide opportunities for consultation with:

- academic staff at all levels
- research and administrative staff
- student representatives
- recent graduates
- key staff in the practice settings which students attend
- representatives of the university administration
- members of the pharmacy profession
- members of key staff in collaborating departments and faculties.

4.6 SET team site visit

The application pro-forma and other relevant documents will be reviewed by the SET team prior to the accreditation visit and will be used to identify areas of initial emphasis during the visit. The visit by the SET team will take place during a teaching period, to allow observation of teaching and student input. The visit will be for two to four days.

Immediately prior to the visit (usually the evening before) the Accreditation Manager will provide an orientation and planning session/presentation to the SET team in order to confirm team member roles and seek agreement on approaches to the various tasks and/or components of the visit schedule. The SET team will inspect resources, including teaching and research laboratories, practice settings used for teaching, accommodation for academic and other staff, library facilities and other resources. Where possible these inspections should take place while the resource is being utilised to enable an appreciation of its appropriateness and usefulness.

Schools who envisage concurrent reviews should make contact with APC not less than nine

months before expiry of accreditation to initiate discussion on proposals for integration with internal reviews and to agree the form and details of the review. Where the accreditation review is integrated with an internal review, it is necessary that the *APC Accreditation Standards* and the internal review criteria are compared and cross-referenced. It is necessary that administrative details be settled at this stage, particularly in relation to responsibility for convening the review committee and organisation of the site visit.

All costs associated with site visit evaluations are met by the university.

4.7 SET team initial feedback

Prior to conclusion of the site visit, the site evaluation team will record:

- overall findings and conclusions concerning the strengths and weaknesses of the school; and
- identification of any Accreditation Standards which it concludes the school does not meet.

This record of findings may contain recommendations relating to the matters addressed by the Accreditation Standards and the SET's preliminary recommendation(s) to the Accreditation Committee concerning accreditation.

The SET will meet with the head of the school prior to departure to provide initial feedback on its findings and recommendations. Dependent on time constraints, feedback may take the form of a verbal report however, in the event of a preliminary written report the head should be given the opportunity to read the draft record of findings before meeting with the team. All copies must be returned to the leader of the SET at the conclusion of the meeting. Both parties should understand that conclusions and recommendations conveyed at the meeting are preliminary and may be modified by the SET or by the Accreditation Committee in its final report.

4.8 Draft SET report

Within four to eight weeks of the completion of the site visit, the SET will complete a draft report of its findings and conclusions. The drafting of the report is the responsibility of the SET leader, who must secure the agreement of all SET members in its final form.

The draft report is sent to the Accreditation Manager and is then referred to the head of the school for correction of matters of fact and initial response to specific recommendations of the report. The Head of School has four weeks to respond. Where this time is not sufficient, the Chair of the Accreditation Committee may grant additional time.

4.9 Schools response to SET report

The head of school's comments are forwarded by the Accreditation Manager to the SET leader, who is responsible for preparation of a final report, having regard to the head of school's response. The SET team leader may make amendments to the draft report or may determine that the draft report should stand and be read in conjunction with the Head of School's response.

After securing the agreement of the other members the final SET report is provided to the Accreditation Committee for consideration.

4.10 Consideration by Accreditation Committee

The Accreditation Committee reviews the final SET report that includes the responses of the Head of School. Review generally takes place when the Committee meets in March and September but consideration may be given out of session. The Accreditation Committee reserves the right to seek further information on any matter prior to making a decision. The Accreditation Committee may recommend to APC that it:

- accredit a pharmacy school for a period of five years or a lesser period as it sees fit; or
- accredit a school for a period of five years or a lesser period, subject to certain conditions being fulfilled within a determined time-frame; or
- require modifications which are designed to resolve matters of concern, set a time-frame for addressing these modifications and set a date for another site evaluation team visit.

4.11 Recommendations to Council

Consideration of recommendations generally takes place when the Council meets in May and November but consideration may be given to out of session by Council Executive to suit individual circumstances. Upon receipt of a recommendation from the Accreditation Committee, the APC may:

- determine the accreditation status of a school or program in accordance with the recommendation of the Accreditation Committee;
- if it is of the view that there are procedural or any other concerns which prevent it from making a decision, request that the Accreditation Committee give further consideration to any relevant matters or take further action prior to it making its determination; or
- take any further action which it considers necessary to assure the quality of its decision on accreditation status.

4.12 Notification of accreditation decision

The Accreditation Manager advises the applicant of the outcome of the Councils decision. Schools that have been granted conditional accreditation must respond on time as advised by any reporting requirements. The notification letter will remind schools of their obligation to inform the public of the level of their accreditation and be encouraged to display the APC Accredited Provider logo on their website.

Following notification to the school the APC will update its website regarding the schools accreditation status.

The steps, procedures and timelines for accreditation processes for established schools are summarized in the table below

Accreditation process for established schools

| Step | Procedure | Timeline |
|------|---|---|
| 1 | Notification to schools by APC | 12 months from accreditation expiry date |
| 2 | Submission of Pro-forma Application | 1 - 3 months prior to accreditation expiry date |
| 3 | Selection of site evaluation team (SET) members | SET members nominated, and approved by APC 2-3 months prior to visit |
| 4 | Submissions by pharmacy profession stakeholders | Calls for submissions 2 – 3 months prior to site visit |
| 5 | Site visit schedule | Prepared in consultations between APC and School at least 1 – 2 months prior to visit |
| 6 | SET team site visit | Before expiry date or on agreed date |
| 7 | SET team initial feedback | End of final day of site visit by chair of SET team |
| 8 | Draft SET report | Report provided to school for comments and corrections within 1 - 2 months of visit |
| 9 | Schools response to SET report | Response to SET recommendations within 1-2 months |
| 10 | Consideration by Accreditation Committee | Final SET Report submitted to Accreditation Committee. Meetings held in April and September each year, otherwise out-of-session consideration |
| 11 | Recommendations to Council | Submitted to Council meetings held in May and November each year, otherwise out-of-session consideration by Council Executive |
| 12 | Notification of accreditation decision | Following Council approval schools are formally notified and APC website is updated to reflect current accreditation status of school |

Note: Where a school may have more than one pharmacy course, site evaluation visits will be synchronised where possible to avoid unnecessary duplication of effort

5. Annual reporting requirements

APC recognizes that schools may be influenced by internal and/or external factors in maintaining and delivering quality educational programs. To that end APC requires submission of annual data with respect to graduate numbers and staff demographics in order to make informed assessments of each school on a regular basis.

This annual data will be compiled by way of CHPSANZ surveys which provide annual graduate numbers, by audit of school websites and/or by direct contact between the Accreditation Manager and each pharmacy school. Such data will also inform APC as to the state of pharmacy education as a whole across Australia and New Zealand.

The process for the collection of annual data has been developed in agreement with the Accreditation Committee, CHPSANZ and all heads of pharmacy schools.

6. Major changes in schools and courses

Major change in an accredited pharmacy school includes any significant change to an existing pharmacy course or factors relevant to its delivery, as identified in the *Accreditation Standards*. Major change includes inter alia:

- change in award title;
- change in course length;
- significant change in curriculum content and/or structure;
- significant change in teaching methods and/or assessment;
- significant change in the human and/or financial resources available for delivery of the course; or
- significant changes in institutional settings and/or the establishment of an additional geographic location at which the program is offered.

The APC supports overseas exchanges for the purposes of *clinical placements* however these should be limited to a period of one semester or less in the context of the whole pharmacy course. Periods longer than this will be regarded as a major change requiring notification to the APC. Also exchanges which involve curricular activities as part of the clinical placement must be notified to the APC irrespective of their duration.

An accredited school must notify APC in writing of any major change immediately following a change decision. The notification must be in the approved form to assist the Accreditation Committee in assessing the potential impact of that change. It is the responsibility of the Accreditation Committee to determine if the major change warrants a re-assessment of the accreditation status of the school, and whether any re-assessment will be carried out by correspondence or by a visit from a site evaluation team. It is also the responsibility of the Accreditation Committee to specify the documentation that will be required in support of a re-assessment.

7. Failure to comply with accreditation standards

The APC recognises that all Australian and New Zealand universities aspire to the highest levels of quality and have a vested interest in ensuring that their professional courses meet the requirements and expectations of external stakeholders, including authorities maintaining Standards for the registered professions.

In view of the above the APC will seek cooperative solutions where the Council determines that:

- a pharmacy school has failed to report, comply with requests for information, or satisfactorily address conditions which it has placed upon the grant of accreditation or approval; or
- it will not grant accreditation/approval of a school or approve a course because the course and/or school fails to meet the requisite standards and there is no reasonable assurance that the school is taking, or has the capacity to take, necessary remedial action.

In the above cases, the President of APC will write to the Vice-Chancellor of the University drawing his/her attention to the Council's concerns. The Council will seek discussions with a view to the Council and the University agreeing on an action plan for addressing deficiencies within a reasonable period.

The President will draw to the attention of the Vice-Chancellor the University's option to seek review of a decision not to grant approval/accreditation in accordance with section 8.1. Should the University wish to exercise this option, the Council will defer further action until the independent review committee has reported.

Notwithstanding the above, APC may revoke or deny accreditation or approval in the event of the Council being unable to be satisfied as to the University's commitment and capacity to remedy deficiencies within a reasonable period. Written notification of such actions will be provided to pharmacy registrars and the public.

8. Appeals Process

8.1 Independent review

A University may seek independent review of recommendations and decisions concerning accreditation of pharmacy school at two stages:

- within ten working days of receipt by the Head of School of a draft SET report; or
- within ten working days of receipt by the Vice-Chancellor's office of a letter of notification of failure to grant accreditation.

The Review Committee will be nominated by the Accreditation Committee and agreed by the University. It must include at least one head of an accredited school of pharmacy, one senior academic of another accredited school of pharmacy and one other person with experience in the practice of pharmacy.

The Review Committee will review the submission and relevant reports and documentation. It will have discretion to interview staff, students and other relevant people, and to inspect facilities where it concludes that such actions are necessary for it to make an informed judgment.

The costs of review must be met by the University concerned. A report prepared by the Review Committee will be forwarded to both the University and APC. The University will be given opportunity to respond to any issues raised in the report, before APC makes a final decision on accreditation status.

8.2 Management of non-accredited school or program

Should schools fail to meet accreditation standards (within an agreed period and/or following independent review) the APC will commence proceedings with regards to the discontinuation of accreditation. The school, faculty and Vice-Chancellor, relevant board and professional

pharmacy groups will be notified that the school no longer meets APC standards and therefore is no longer accredited.

The school may then choose to undertake a number of options with regards to students currently enrolled:

- Devote resources which ensures that all remaining students complete the pharmacy program
- Make arrangements with a University that can transfer remaining students into an accredited program
- The alternative University must be able to satisfy the APC that it has adequate resources, sufficient academic staff and clinical placements to incorporate the extra students
- Students would graduate as cohorts of the alternative University as it would be recognized as an accredited program by regulatory authorities

9. Complaints Process

APC may receive complaints from the public with regards to accredited pharmacy schools. A process for lodging complaints and the mechanisms to address and respond to complaints follows.

- Only complaints in writing will be considered by the APC
- Complaints should be addressed to the CEO in confidence
- Only complaints pertaining to accreditation matters will be considered
- Complaints of a personal nature are not within the purview of the Committee and would not be considered
- The accreditation matter(s) outlined in the complaint will be discussed between the Accreditation Manager, the Chair of the Accreditation Committee and the relevant jurisdictional body to agree on a course of action
- Should the course of action resolve, or find the complaints unsustainable the matter will be deemed resolved and all parties to the complaint notified

If following the course of action the complaint is sustained the school will be provided with an opportunity to respond to allegations. Should an unsatisfactory response ensue from the school further action may be implemented until such time that APC is satisfied that all allegations have been addressed. This may include imposing conditional accreditation requirements on the school.

10. Public notification of accredited pharmacy schools

The APC will maintain an up to date register of accredited pharmacy schools (and its courses) throughout Australia and NZ and which will be posted on the APC website as a means of notifying all stakeholders (and the general public) regarding pharmacy school accreditation and their level of accreditation. These are:

1. Preliminary Approval
2. Provisional Accreditation
3. Full Accreditation

11. Accreditation Fees

Accreditation by APC is subject to a number of fees set at levels necessary to recover costs in providing the Accreditation Committee secretariat.

There are three sets of fees:

Preliminary Approval fee

Preliminary approval applications are subject to a one-off fee. The application fee covers the costs of evaluation of the application by external reviewers and is payable on receipt of invoice following an application being made.

Annual accreditation fee

Each accredited school must pay an annual accreditation fee, with the fee falling due on 1 January or on the date of application for preliminary approval (schools making application on or after 1 July are liable for one half of the annual sustaining fee for that year only).

The annual fee is payable on a calendar year basis and includes two components; a sustaining fee and a capitation fee. The latter is calculated using student enrolments derived from EFTSU/EFTS data in the pharmacy program at the first census of the preceding calendar year; i.e. July for Australian universities and April for New Zealand universities.

Student enrolment data is supplied by the Department of Education Employment and Workplace Relations (DEEWR - formerly DEST) in Australia and the Ministry of Education in New Zealand.

The annual accreditation fee accounts for the costs associated with the development and maintenance of accreditation documentation, provision of external evaluator reports (not involving site visits), provision of accreditation advice for all stakeholders and the provision of secretariat support for the APC Accreditation Committee.

The annual accreditation fee is invoiced on 1 January each year.

Site visit Accreditation Fee

This fee covers the direct costs of Site Evaluation Team (SET) members including honorarium, travel, accommodation costs and overall administration by the APC. The fee is dependent on the size and complexity of the school and the scope of the site visit. It is payable on invoice to the University following the site visit.

Schools should contact the Accreditation Manager if assistance is required in developing a budget.

Current fee schedules are available at the APC website