

# APC review of pharmacy accreditation standards CONSULTATION 1

The Australian Pharmacy Council (APC) would like to express our sincere thanks to the individuals, groups and organisations who gave us feedback during consultation phase 1 on the scope and direction of the new standards. We appreciate and value your input which will contribute to the development of the next iteration of pharmacy education and intern program standards

This report outlines the consultation process we undertook and provides a summary of the feedback and comments received from stakeholders. It also outlines the next steps we will take.

## BACKGROUND

The Australian Pharmacy Council Ltd (APC) is the independent accreditation authority for pharmacy education and training programs in Australia. We work as part of the National Registration and Accreditation Scheme (NRAS or National Scheme), which was created in 2010 under the National Law (Health Practitioner Regulation National Law Act (Queensland) 2009) and as such, we work under assignment of the Pharmacy Board of Australia (PharmBA), the National Board responsible for the regulation of the pharmacy profession in Australia. We also provide accreditation recommendations to the Pharmacy Council of New Zealand (PCNZ).

We are reviewing the following standards:

[Accreditation Standards for Pharmacy Programs in Australia and New Zealand \(2014\)](#)  
[Accreditation Standards for Australian Pharmacy Intern Training Programs \(2010\)](#)

The PharmBA has sponsored and funded this review of the pharmacy standards.

## AIM

The aim of this review is to produce a set of accreditation standards that will:

- ensure graduates who achieve registration are competent and qualified to practise as pharmacists
- ensure graduates are ethical, safe practitioners for the benefit and well-being of the public
- ensure graduates are flexible, adaptable and responsive to the evolving needs of individuals and communities, and
- equip graduates with the skills which will allow them to adopt to as-yet-unknown scopes of practice which will emerge during their careers, through a commitment to lifelong learning.

## CONSULTATION PROCESS

In October 2018, APC published the first of two consultation papers as part of its review of the current approved program accreditation standards for pharmacy degree and intern training programs.

### Purpose

Under the National Law, we have an obligation to develop standards that reflect the objectives and guiding principles of the National Law and are informed by national and international research and practice. In addition, we are required to consult with those who have an interest in the outcome of this review. The requirements ensure that the standards which will be developed are contemporary, based on the best available evidence, and appropriate for the needs of the profession.

Our aim for the first consultation was to engage with a broad range of stakeholders to seek their views on what they saw as important in setting the scope and direction of the future standards that we would develop as part of this review.

### Timeframe

APC undertook the first part of its public stakeholder consultation process between 19 October and 28 November 2018.

### Promotion

The consultation process and timeframes were promoted via

- pharmacy media outlets
- social media
- direct e-mails sent to key stakeholders
- APC website

Included in this group were

- professional associations
- registered pharmacists
- community and consumer groups
- peak professional organisations
- education providers (universities and intern training program providers)
- other health professional accreditation authorities in the National Registration and Accreditation Scheme
- interns and students
- early career pharmacists
- other relevant stakeholders

### Consultation documents

The first part of our consultation process was supported by the following documents

- [Health Profession Accreditation Practices International Literature Review](#) (August 2018)
- [Consultation Paper One](#) (October 2018)
- Statement of the areas for consultation
- Consultation Questions (and response template)

### Ways to give feedback

Stakeholders were invited to submit feedback to the APC nominated areas for consultation or more broadly on pharmacy education including the intern year, via an anonymous online survey, written response to targeted consultation questions, a free form written submission or direct conversation with the APC Project Consultant.

APC made the following statement on its website during the consultation process and throughout its consultation papers;

*APC will not publish the comments or feedback we receive in full.*

*In the interest of transparency, we will publish a summary of the major themes derived from the comments and feedback we receive from stakeholders, along with our response to the matters raised from this consultation. Material supplied in confidence, should be clearly marked 'IN CONFIDENCE' and be provided as a separate attachment to any non-confidential material or feedback you give us.*

*Information we receive that is marked confidential or given in confidence will be treated as such.*

*We will e-mail a link to stakeholders when we publish the summary of the major themes (and our response) on the APC website.*

## CONSULTATION OUTCOMES

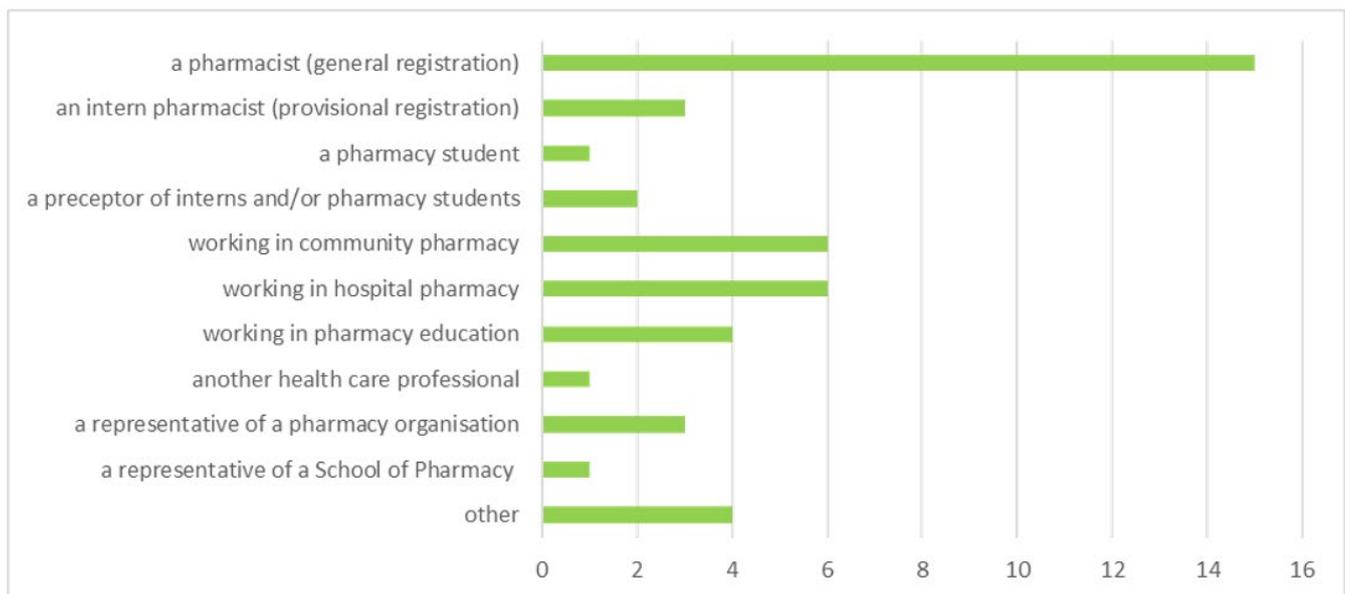
### Respondent profiles

We received feedback from 50 stakeholders in response to Consultation Paper One.

The following figures provide a breakdown of those who responded, noting that respondents could indicate more than one descriptor in the online survey.

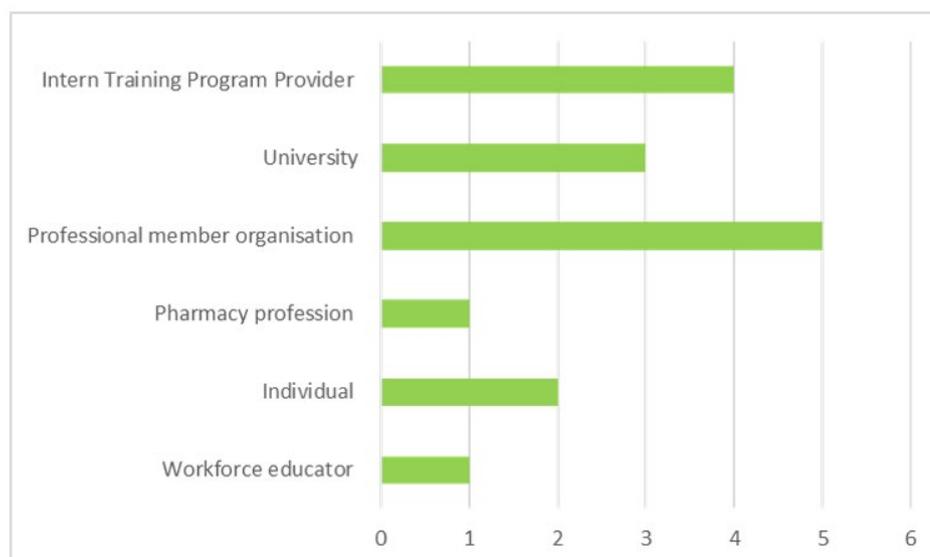
### Survey respondent profile

We received 34 responses to the online survey. As part of the survey each respondent was asked to identify their professional profile. The results are represented below:



### Written/interview respondent profile

We received 14 written and 2 interview responses from individuals and organisations:



## Evaluation of responses

The feedback from written, interview and survey responses was reviewed by the project team and Governance Group.

The key findings included support for the following:

- **improving alignment** with other health professions through adopting a structured five domain model but ensuring a profession-specific focus
- **strengthening the balance** between outcomes, processes and key inputs
- **adopting social accountability** as the underpinning principle (noting that other health professions have chosen to refer to public safety)
- **developing a single set of Standards** for both degree and intern training programs
- the **option** for providers to offer integrated programs encompassing the degree and intern years
- developing Standards which promote
  - o a **future practice** focused approach to education
  - o **fitness-to-practise** in the current environment and **adaptability** to new practice environments
  - o **flexibility** to encompass new scopes of practice as they emerge
- developing a set of **performance outcomes** which outline expected performance of graduates at the two milestones of end of degree program and point of general registration
- **streamlining** accreditation processes with other quality requirements for providers
- **strengthening** processes around **experiential learning** including
  - o preceptor/site selection and training
  - o communication between education providers and placement sites/preceptors
  - o quality of the student/intern experience
  - o diversity of sites for experiential learning
  - o quality (reliability, validity, consistency) of workplace assessments
- incorporating **interprofessional learning** and **practice opportunities** across the full span of education and training
- encouraging use of **simulation** as a means of complementing but not replacing work-integrated learning
- including a broader definition of **cultural safety** to encompass consideration of social determinants of health, including
  - o Aboriginal and Torres Strait Islander and Māori peoples
  - o culturally and linguistically diverse communities
  - o all communities with specific health needs
- **strengthening the skill set** of graduates, including research literacy and digital literacy
- ensuring Standards do not constrain **innovation**

Areas where agreement was less clear included:

- how to **specify** expected level of performance at each milestone
  - o same outcomes at different level for each milestone (eg Miller's triangle)
  - o different outcomes for each milestone

- the **basis** for development of the performance outcomes
  - o National Competency Standards Framework
  - o derived from National Competency Standards Framework
  - o TLOs and PhLOS
- the **relationship** of current Standards to post-general registration practice

Additional comments included the need for:

- the concept of **fitness-to-practise** to include issues of self-awareness, health, mental health and resilience
- clarity about the **definition** of social accountability
- clarity around whether graduates should be **practice-ready** or **internship-ready**
- a clearer definition and explanation of **simulation**
- assistance for providers in completing re-accreditation documentation (such as through the provision of an Evidence Guide)

In addition, a number of respondents suggested specific additional elements that might be included as **performance outcomes**.

## WHAT APC WILL DO NEXT

1. APC has prepared a single set of draft standards for both degree programs and Intern Training programs based on the feedback received to date and will release these for a second public consultation during the period 18 March 2019 – 26 April 2019. These standards have been developed in consultation with the project Governance and Reference Groups, and incorporate feedback from the first public consultation. A draft set of performance outcomes will also be released for comment and feedback as part of the second consultation phase. The performance outcomes are designed to indicate the nature and level of performance to be demonstrated by graduates by the time they reach each of the two milestones on their pathway, (i.e. degree program completion and achievement of general registration).
2. APC will inform the Pharmacy Board of Australia of the progress of the development of new standards and specifically the support for:
  - a. a single set of Accreditation Standards covering degree programs and intern training programs
  - b. the option for providers to offer integrated programs (leading to registration)
  - c. clinical site and preceptor quality assurance and improvement
  - d. development of a flexible performance outcomes framework to underpin the standards
  - e. a robust Evidence Guide as a companion to the accreditation standards.

APC will convene two face to face consultation sessions to ensure ease of review and consideration of the draft standards and performance outcomes. The first session will be held in Canberra 12 April and the second in Brisbane 16 April 2019. Further details will be announced shortly. The standards will then be rewritten to incorporate the feedback prior to review by the Reference Group.