



19 April 2011

Response from the Pharmacy Guild of Australia to the Senate Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency

Background

The Pharmacy Guild of Australia (Guild) is pleased to be able to provide comment to the Senate Finance and Public Administration Committees into the administration of health practitioner registration by the Australian Health Practitioner Regulation Agency (AHPRA).

The Guild is an employers' organisation servicing the needs of independent community pharmacies. With Branches in every state and territory, we strive to promote, maintain and support community pharmacies as the most appropriate primary providers of health care to the community through optimum therapeutic use of medicines, medicines management and related services.

To gain general registration, upon graduation, a pharmacist must undertake an internship of 1824 hours of supervised practice, under the direct supervision of a pharmacist who holds general registration (a preceptor). There are caveats as to how an intern's supervised practice can be achieved and this is provided through Guidelines¹ provided by the Pharmacy Board of Australia (Board). In addition to requiring supervised practice to be undertaken regularly and consistently, these include:

- a minimum period of 152 hours of supervised practice under an individual approved preceptor and
- a minimum of 80 hours and a maximum of 180 hours of supervised practice within a period of four consecutive weeks.

After completing the supervised practice requirements, an intern must then successfully pass pre-requisite written and/or oral exams conducted by or on behalf of the Board in accordance with policies published by the Board.²

¹ Pharmacy Board of Australia: Supervised practice arrangements registration standard; www.pharmacyboard.gov.au

² Pharmacy Board of Australia: Examinations for general registration standard

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Since the National Registration and Accreditation Scheme (NRAS) commenced on 1 July 2010, the Guild has been monitoring AHPRA registration issues for pharmacists through pharmacy media reports, online pharmacist discussion groups and member feedback through our Branches.

In preparing this submission, the Guild has sought feedback from members through its Branches and reviewed reports in pharmacy media and public discussion groups. Many of the issues have been collated into a general summary. Where information relates to an individual pharmacist's personal experience, details can be provided to the Senate Inquiry in the strictest confidence, should verification be required.

Feedback from our Branches has indicated that the issues have been cross-jurisdictional, however, to more clearly demonstrate the problems encountered at a personal level, we have included a report prepared by the NSW Branch of the Pharmacy Guild of Australia as *Attachment A*.

AHPRA has also announced the intent that partially regulated professions such as chinese medicine practitioners, medical radiation practitioners, occupational therapists, and Aboriginal and Torres Strait Islander health practitioners will join the National Registration and Accreditation Scheme (NRAS) from 1 July 2012.³ We suggest that it is essential that the issues identified with registering the existing contingent of health professional groups should be addressed before adding new groups.

Key Points

The three major areas of concern for the Guild have been:

1. 2011 interns seeking provisional registration
2. 2010 interns seeking general registration
3. General registration Issues

The principle problems encountered with the AHPRA process have been:

- inefficient processing of registration
- lengthy delays that have impacted on pharmacy staffing arrangements, personal income, wage costs, disciplinary action and pharmacy ownership
- lack of consistency in managing applications
- communication issues
- complaint handling

Comments

The following summarises the principle problems with the processing of registration applications by AHPRA identified by the Guild.

³ <http://www.ahpra.gov.au/News/National-Registration-and-Accreditation-of-the-partially-regulated-professions.aspx>

1. Inefficient processing of registration

Problems encountered included:

- 1.1 Lengthy delays – reports of applications taking up to 3 months to process
- 1.2 Bottlenecking – the Guild understands that applications requiring a criminal history check may cause a ‘bottle neck’ for processing applications
- 1.3 An online option for fast track applications would have expedited the process
- 1.4 Inability of AHPRA operators to provide enquirers with an accurate update on the status of their application, to the extent that some pharmacists have reported that they could not even confirm if their paperwork had been received by AHPRA
- 1.5 Reports of difficulty with the online registration process because the system had the American dating system for recording the date of birth (mm/dd/yy)
- 1.6 Reports that receipts and certificates are being issued 4 to 6 weeks after the payment has been processed
- 1.7 Reports of removal from the pharmacist register without any communication from AHPRA, having both legal and indemnity issues for pharmacists

2. Lengthy delays that have impacted on pharmacy staffing arrangements, personal income, wage costs, disciplinary action and pharmacy ownership

Problems encountered included:

- 2.1 When confirmation of provisional registration has been received, supervised practice approval was not provided. This meant that interns were unable to have hours worked in the interim recognised as part of their supervised practice quota.
- 2.2 The lengthy delays for interns to arrange registration impacted wages and pharmacy staffing arrangements:
 - Delays for 2010 interns to obtain general registration have meant that pharmacists were unable to include the registrant on the roster without supervision. This has meant the registrant continued to be paid at an intern’s rate and the pharmacy’s wages bill was increased from having to pay both pharmacist and intern wages. The Guild is aware that:
 - a number of 2011 interns have claimed that lost wages from not being registered in a timely manner have cost them over \$4,000 each
 - one pharmacist has claimed to have postponed planned leave because the 2010 intern was unable to work without supervision because of the delayed registration
 - Until provisional registration was effected, pharmacists and interns were unsure of whether supervised practice would be recognised for 2011 interns. With limitations on the number of hours per week that an intern can work, this may delay applications for general registration at the end of 2011. This could in turn impact on intern placements for 2012. In addition, interns who are engaged under contract arrangements during 2011 may be impacted by not being able to complete their supervised practise quota of 1824 hours within the contract period.

- 2.3 A number of interns applying for general registration have had to pay two lots of registration so that they can continue to work; a provisional registration fee for them to continue to work as an intern until they are registered and then a general registration fee for them to work as a fully qualified pharmacist.
- 2.4 A number of members have advised the Guild that because of delays in the process for their registration renewal, they were removed from the pharmacy register and subsequently contacted by the relevant state pharmacy regulatory authority with the threat of disciplinary action for practising without registration.
- 2.5 Because pharmacies must be owned by a pharmacist, the removal from the pharmacy register has the potential to impact ownership arrangements. This is a critical aspect for pharmacy practice that is not observed with the registration process for other health professionals.

3. Lack of consistency in managing applications

Problems encountered included:

- 3.1 The Guild is aware of several reports where the application for some pharmacists were processed quicker than others, even though these pharmacists lodged their applications at later dates and when process criteria such as criminal history checks were not necessarily the cause of the delay. This appears to have occurred with both general registration renewal and intern applications.

4. Communication issues

Problems encountered included:

4.1 Conflicting advice from AHPRA operators and public notices

- AHPRA Media Releases of 20 January 2011 and 25 January 2011 advised practitioners whose registration application has been received by AHPRA that they can continue to practice while their application is being processed, even after the conclusion of the one month grace period. Anecdotal reports indicate that AHPRA phone operators however were advising pharmacists that until their application was processed, they were not registered and could not practice.
- AHPRA Media Release of 11 February 2011 advised that Fast Track applications are usually processed within 48 hours. Again, anecdotal reports indicate that AHPRA phone operators were advising that it could still take 4 to 6 weeks.

- 4.2 Pharmacists have reported on the difficulty in having to deal with a different AHPRA operator with each enquiry. It would seem that operators have not had access to records of previous enquiries. This meant the pharmacist had to re-explain the whole situation with each call.

Pharmacists have also reported having great difficulty in transferring enquiries to personnel with authority. Operators tended to triage calls with generic advice that applications were being processed but were unable to provide accurate information on the status of the application and whether there were issues that needed to be addressed.

- 4.3 Pharmacists enquiring about their registration status have reported being advised to check the online register while at the same time being informed that the online register may not be current.
- 4.4 One pharmacist has reported calling AHPRA on their intern's behalf after the intern's application had not been processed 2 months after sending by express post. After waiting on hold for over one hour, the pharmacist was advised that the operator could not discuss the intern's situation because of privacy reasons. This pharmacist has also reported that the intern received an email from AHPRA requesting them to stop contacting them as it delayed the process.
- 4.5 Two of the most common complaints from pharmacists that have caused considerable angst and frustration have been:
- the lengthy waiting periods they were kept on hold when making phone enquiries and
 - the lack of response to voice-mail messages or email enquiries

While it is understandable that delays can be expected in high volume call centres, it is important to ensure adequate staffing to manage such situations, and it is essential to respond to people that leave a message or send an enquiry so they have some acknowledgement of their issue.

5. Complaint handling

Problems encountered included:

- 5.1 Complainants being advised that complaints could only be provided in letter format that had been sent through the post.
- 5.2 Complainants advising that they had received no indication of receipt of their complaint.
- 5.3 Complaints about AHPRA having to be sent to AHPRA for a response. This raises questions of transparency and objectivity.

Recommendations

To address the issues described above, the Guild makes the following recommendations:

1. Implement online systems as a priority for all registration processes.
2. Review staffing arrangements to ensure:
 - 2.1 adequately trained staff
 - 2.2 appropriate staff numbers to respond to the volume of applications and enquiries
3. Review communication systems to ensure:
 - 3.1 consistent messages are being provided
 - 3.2 a response is provided to all enquiries in a timely manner
 - 3.3 all enquiries and responses are documented for future reference by any operator if follow-up is required
 - 3.4 pro-active notification to students/interns regarding status of application

4. Implement systems to allow any operator to have access to current information to an applicant's history so that:
 - 4.1 full details of the status of an application's progress is immediately available upon enquiry
 - 4.2 the need for people making an enquiry to repeat details is minimised
5. Applicants should be immediately informed when a discrepancy in the application is found.
6. Applicants should have the discretion to organise their own criminal history check at their own expense as a means to expedite the registration process. In such circumstances, the registration fee should then be appropriately discounted.
7. Implement processes so that administration is finalised in a prompt fashion. Certificates and receipts should be issued immediately upon completion of the process, not 4 to 6 weeks later.
8. Pharmacy students should be able to submit provisional registration applications prior to graduation for AHPRA to complete most of the process prior to confirmation of final exam results. Universities could provide AHPRA with final exam outcomes to allow finalisation of the registration process. Payment can be made upon confirmation of status.
9. Hours worked by the 2011 interns from AHPRA's receipt of provisional registration application should be allowed to be counted towards the required 1824 hours of supervised practice. This will prevent employment problems for the next cohort of interns in 2012 and will allow interns engaged via contract to complete their requirements within the contract period.
10. Ensure the transfer from provisional to general registration is completed in a prompt manner to ensure smooth transition from intern to pharmacist.
11. Provisional registration should be extended within reasonable limits beyond 12 months to allow sufficient time for Board requirements to be met without additional expense to interns from having to pay two sets of fees.
12. AHPRA should be encouraged to engage more with the professions through a formal advisory committee to resolve issues. Many of the administrative problems surrounding the renewal and registration process may have been avoided or minimised had AHPRA collectively engaged with the all of the professions concerned from the beginning of the registration process.
13. Ensure there is appropriate communication with pharmacists prior to removal from the pharmacy register and that adequate time is allocated to allow pharmacists to rectify any registration renewal anomalies prior to removal from the register.
14. Problems with the registration process for the current list of health professionals should be addressed prior to adding new professional groups. Until AHPRA can demonstrate that it can manage the administration for the current registration system, the inclusion of new professional groups should be delayed.

Conclusion

Acknowledging that there are numerous benefits with national registration, it is essential that the system operates effectively and that health practitioners are not unduly impacted by problematic administration processes. We appreciate the opportunity to provide this feedback and are available for further consultation if required.

Attachments

Attachment A: NSW Branch of the Pharmacy Guild of Australia – AHPRA Registration Report