

Submission to:

Inquiry into the administration of health practitioner registration by the Australian Health Practitioners Regulation Agency

12th April 2011

Contact for further information
Yvonne Allinson, CEO
The Society of Hospital Pharmacists of Australia

Email: shpa@shpa.org.au

The Society of Hospital Pharmacists of Australia

SHPA Federal Secretariat

Mailing address: PO Box 1774 Collingwood 3066 Victoria Australia
Office location: Suite 3, 65 Oxford Street Collingwood 3066 Victoria Australia
T: 61 3 9486 0177 F: 61 3 9486 0311 E: shpa@shpa.org.au W: www.shpa.org.au

Summary

SHPA acknowledges that the Pharmacy Board of Australia (PBA) should at all times give consideration to public safety in its administration of the Health Practitioner Regulation National Law as in force in each state and territory pertaining to practical training, the initial Australian registration and the re-registration of pharmacists.

SHPA notes that PBA requires and has policies and guidelines for five categories of 'applicants':

- Australian residents / citizens who have completed an Australian pharmacy course
- Non-Australian residents who have completed an Australian pharmacy course
- Australian residents / citizens who have completed an overseas pharmacy course and have undertaken the Australian Pharmacy Council (APC) assessment process for registration
- Applicants who have previously held general registration as a pharmacist
- Applicants who currently hold general registration.

The current registration system has a minimum of nine steps after the applicant has completed their pharmacy degree or equivalent qualifications, several have inherent delays as they rely on information from a variety of third parties. The administration of these three crucial processes can and should be reviewed and improved to streamline application and approval processes.

The need to manage several initial registration categories in addition to the 'usual' onerous provisional registration, intern training requirements and registration process provides considerable administrative challenges for PBA.

Delays and uncertainty with the registration of pharmacy interns and pharmacists is frustrating for both employers and the employee.

SHPA believes that AHPRA and PBA could improve the administration process by:

1. Providing clear and concise instructions for applicants with information on the required supporting documentation.
2. Using a 'lean' approach to this complex process to streamline the application approval processes for pharmacy interns and initial registration.
3. Removing the need for multiple submissions of the same supporting documentation.
4. Implementing a common approach to these processes in all offices of AHPRA.

Improvements could also be made by moving the requirement re English language skills to the provisional registration process and moving some of the proof / evidence required for initial registration to the oral examination application.

Delays in the registration of medical interns are impacting on their registration with Medicare Australia reducing the safe use of medicines as other doctors must write PBS prescriptions for patients.

Finally a common help line for all health practitioners has inherent problems. Work is required on the triaging and referral of enquiries. Communication with and the information available to Australian pharmacy students, overseas applicants, pharmacy interns, pharmacists currently registered and seeking re-registration, pharmacy preceptors and employers needs improvement.

Background

The Society of Hospital Pharmacists of Australia (SHPA) is the national professional organisation for more than 2,800 pharmacists, pharmacy students, pharmacy technicians and associates working across Australia's health system.

Established in 1941 following the pioneering efforts of 25 public hospital pharmacists from Victoria, the inaugural meeting of the SHPA national council and the first national conference was held in Adelaide in 1961.

SHPA is the only professional pharmacy organisation with a core base of members practising in public and private hospitals and other health service facilities.

Reflective of changes in health care, SHPA's membership is now drawn from the diverse pharmacy practice settings of public and private hospitals (urban, rural, general, specialty, small and large), community pharmacy, academia, research, industry, government, consultant / accredited pharmacists providing medication reviews at home or in residential aged care, quality use of medicines projects, medication safety, clinical governance and medicines management programs.

SHPA acknowledges that the Pharmacy Board of Australia (PBA) should at all times give consideration to public safety in its administration of the Health Practitioner Regulation National Law as in force in each state and territory pertaining to practical training, the initial Australian registration and the re-registration of pharmacists.

The administration of these three crucial processes can and should be reviewed and improved to streamline application and approval processes.

Initial registration process for pharmacists

The current registration system has a minimum of nine steps after the applicant has completed their pharmacy degree or equivalent qualifications (shown in Figure 1). Several steps have inherent delays as they rely on information from a variety of third parties including:

- education providers
- the Australian Pharmacy Council (APC)
- intern training providers (ITP)
- pharmacist preceptors
- state and territory police services

It should be noted that the onus of applying and collecting all relevant certification and examination results lies with the applicant. Communicating the requirements for registration and how applicants can access each of the mandatory programs, exams and other mandatory requirements is therefore crucial.

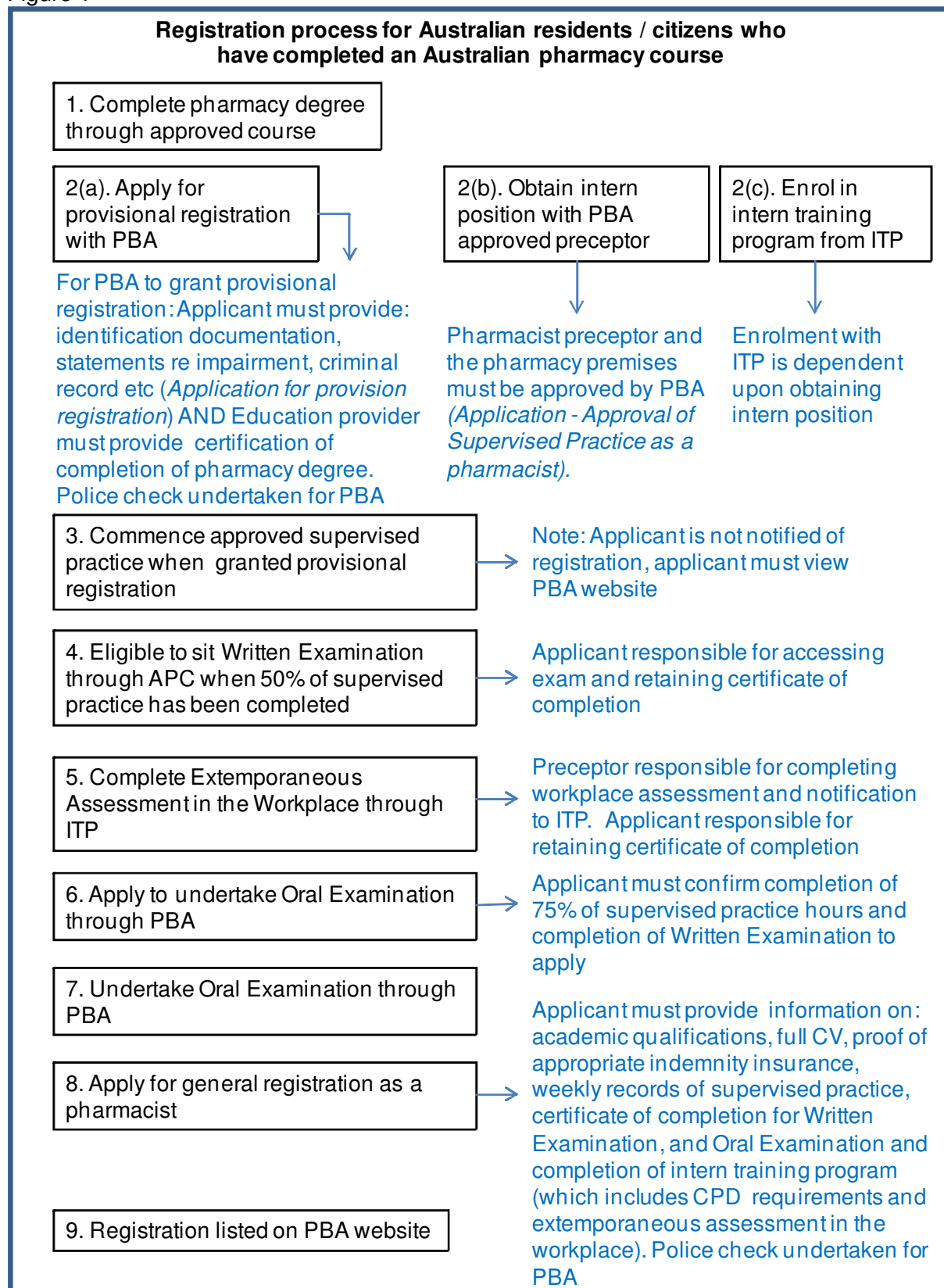
Communication with and the information available to Australian pharmacy students, overseas applicants, pharmacy interns, pharmacists currently registered and seeking re-registration, pharmacy preceptors and employers needs improvement.

Although there is one common process for the registration of pharmacists SHPA notes that PBA requires and has policies and guidelines for five categories of 'applicants':

- Australian residents / citizens who have completed an Australian pharmacy course
- Non-Australian residents who have completed an Australian pharmacy course
- Australian residents / citizens who have completed an overseas pharmacy course and have undertaken the APC assessment process for registration
- Applicants who have previously held general registration as a pharmacist

- Applicants who currently hold general registration.

Figure 1



There are additional requirements for non-Australian residents who have completed an Australian pharmacy course in step 8 (specifically English language requirements), Australian residents / citizens who have completed an overseas pharmacy course and have

undertaken the APC assessment process for registration in steps 1, 2(a) and 8 and previously registered pharmacists in steps 2(a) and 8.

As figure 1 illustrates the same information must be submitted by the applicant or processed by PBA at least twice, for example the applicant's academic qualifications, completion of Written Examination and police check.

Applications for provisional and initial registration for pharmacists peak in line with the academic year. In fact all of the profession covered by APHRA will have peak initial registration periods in line with the academic year. These are inherent bottle-necks and the PBA has no means for spreading the bulk of applications across the calendar year.

The need to manage several initial registration categories in addition to the 'usual' onerous provisional registration, intern training requirements and registration process provides considerable administrative challenges for PBA.

SHPA notes that the PBA has the responsibility to hold oral examinations for pharmacy interns multiple times throughout the year across every state and territory which is a considerable workload.

SHPA also notes that the rapid rise in the number of university graduates is placing considerable strain in many areas as this increase requires a greater number of pharmacy academics, under graduate training placements, intern placements and specialised expertise within PBA.

Annual registration process

APHRA has spread the re-registration of professions across the calendar year. The re-registration period for pharmacists closes 30th November which coincides with the end of the academic year.

This has resulted in considerable delays during the transition period which should be overcome in future years.

SHPA offers the following comments on to the Senate Finance and Public Administration Reference Committee on the administration of health practitioner registration by the PBA through AHPRA.

Capacity and ability of AHPRA to implement and administer the national registration of health practitioners

SHPA believes that AHPRA and specifically the PBA have the ability to implement and administer the national registration of pharmacists. They have demonstrated this through the following achievements in the first eighteen months of operation:

- Development of a series of national standards relating to registration, CPD, pharmacy practice etc.
- Transition of registered pharmacists to a national register (to be completed in June 2011)
- Introduction of national process for transitional registration for pharmacy graduates
- Implementation of a national oral examination process for pharmacy interns
- Development of national processes for practical training during the intern year, initial Australian registration and re-registration of pharmacists
- Development and launch of the online Register of Practitioners

The capacity of AHPRA as a whole to administer the multifaceted processes for fifteen professions is less certain. Issues relating to other professions and generic services such as the website and access to advice through the online or telephone help services have been problematic.

Performance of AHPRA in administering the registration of health practitioners

SHPA acknowledges that the PBA should at all times give consideration to public safety in its administration of the Health Practitioner Regulation National Law as in force in each state and territory pertaining to practical training, the initial Australian registration and the re-registration of pharmacists.

As noted earlier the re-registration period for pharmacists closes 30th November which coincides with the end of the academic year. This has resulted in considerable delays during the transition period which should be overcome in future years.

The major issue that needs to be addressed is the performance of AHPRA in administering the initial registration of health practitioners.

Initial registration of pharmacists

Figure 1 illustrates the current complex approval system for Australian residents / citizens who graduate from an Australian university. The system is even more complex when applicants need to complete additional examinations and provide additional supporting documentation.

Anecdotally the approval process for pharmacy interns and initial registrations can take up to 6-8 weeks in some states.

SHPA believes that AHPRA and PBA could improve the administration process by:

1. Providing clear and concise instructions for applicants with information on the required supporting documentation.
2. Using a 'lean' approach to this complex process to streamline the application approval processes for pharmacy interns and initial registration.
3. Removing the need for multiple submissions of the same supporting documentation.
4. Implementing a common approach to these processes in all offices of AHPRA.

Each of these issues is discussed below.

The AHPRA website includes an overview of the pharmacy internship for graduates from Australian universities. This is reproduced below (current April 2011). There are 19 hyperlinks, the majority to information on the AHPRA website but also to two other related websites. Most of the hyperlinked documents are more than 4-5 pages long. The *Intern Guide* listed in sixth paragraph is the most helpful and succinct document.

Despite the complexity this web page does not include:

- information for overseas graduates of Australian universities who are required to sit additional examinations and provide additional supporting documentation to apply for provisional and initial registration
- the supporting documentation required. These details are buried in the explanatory small print for questions within the application forms and the required forms for supporting documentation are explained in a separate section of the website: 'forms'

- the Standards applicants must adhere to and make a statutory declaration about in their application are available in separate sections of the website: 'Regulation Standards' and 'Codes and Guidelines'
- the application for initial registration

In addition this web page does not contain information for previously registered pharmacists, overseas qualified pharmacists or overseas students.

Graduates of an approved program of study

Graduates of an [approved program of study](#) are required to complete a period of supervised practice in accordance with the requirements set out in the Board's [Supervised practice arrangements registration](#) to be eligible to apply for general registration.

An [Application for provisional registration as a pharmacist APRO-07](#) (738 KB,PDF) must be submitted with an [Application for approval of supervised practice as a pharmacist AASP-07](#) (467 KB,PDF) before supervised practice may be commenced.

Interns must complete supervised practice in accordance with the requirements set out in the Board's [Supervised practice arrangements registration standard](#) and pass the Board Registration Examination which is also detailed in the Board's [Examinations for general registration standard](#).

The written examination is conducted by the Australian Pharmacy Council. Further information can be found on their [website](#).

The oral examinations will be held in each jurisdiction according to the [Schedule of oral examinations](#). An [Application to be a candidate for an oral examination for Pharmacy Interns - APOE-60](#) (320 KB,PDF) must be lodged by the published closing date for that examination period. Further information about the oral examination is detailed in the [Oral Examination Candidate Guide](#) (113 KB,PDF).

Information relating to the internship is provided in the [Intern Guide](#) (465 KB,PDF) and [Preceptor Guide](#) (392 KB,PDF). A component of the internship is the development of a Training Plan to address the competencies required of a pharmacist.

The [sample Community Intern Training Plan](#) (69.5 KB,XLS) and [sample Hospital Intern Training Plan](#) (68.0 KB,XLS) can be used as a guide in the preparation of the intern's plan.

Preparation of extemporaneous products also forms part of the internship. The Board's [Letter to preceptors](#) (22.3 KB,PDF) outlines the requirements for this activity. Interns should consult the [Extemporaneous dispensing procedures form](#) (32.0 KB,PDF) before completing the [Extemporaneous dispensing product report](#) (33.0 KB,PDF).

Preceptors are required to complete the [Extemporaneous dispensing preceptor statutory declaration](#) (36.0 KB,PDF) once the intern has prepared the six extemporaneous products. These forms are to be submitted to the co-ordinator of the intern's Intern Training Program.

A [Frequently Asked Questions for Pharmacy Interns and Preceptors](#) (453 KB,PDF) is also available.

There is a need to provide clear and concise information about the whole registration process for all types of applicants.

The plethora of application forms frequently requires the same supporting documentation. For example proof of identification and proof of qualification are required as part of the application for provisional registration. The same proof of identification and proof of qualification are required as part of the application for initial registration. Similarly the applicant must make a declaration regarding their criminal history in both applications which is confirmed through a police check. For the majority of applicants these requirements are resubmitted within a 12 month period.

A lean approach is required to review and improve the registration process, processing of documentation from external bodies (such as APC, universities, state

and territory police services) and the supply of supporting documentation by the applicant.

As well as simplifying the process for applicants, removing the need for multiple submission of the same supplementary information would considerably decrease the workload within AHPRA associated with all applications, minimise duplicated work and answering applicant queries.

A Board approved English language test is required for many applicants seeking initial registration. The ability to communicate in conversational English is essential to the practice of pharmacy and is a crucial competency assessed in the oral examination.

SHPA believes this requirement should be assessed and confirmed earlier in the applicants training period. Rather than being a requirement for initial registration it should be included in application for provisional registration. Any applicants with an identified problem with their English language skills would then have time to rectify issues prior to sitting the oral examinations, minimising the number of applicants who fail this examination based on their English communication skills.

Consideration should also be given to moving some of the proof / evidence required for initial registration to the oral examination application. This would allow AHPRA staff to complete all relevant checks and searches in the time between the application for the oral examination and the final step of the process, the application for initial registration which would then only require proof of completion of the oral examination, intern training program and supervised training hours to be approved.

SHPA understands that different processes are in place throughout AHPRA to administer the same application type. This has led to considerable differences in the time it takes for an application to be considered and approved. (Anecdotally Victorian applicants for provisional and initial registration are processed much faster than applicants in New South Wales where the approval time can be up to 6-8 weeks.)

Delays in registration approvals are creating considerable problems in the workplace.

There is no 'guaranteed' timeline for provisional registration. This means that a workplace cannot agree a starting date with the pharmacy intern. Both employer and employee are totally dependent upon the PBA in granting provisional registration. The applicant is not personally notified when approval is granted. The onus is on the applicant to check the AHPRA website and when their name is listed with a registration number, they can begin their supervised practice. This may be up to two months after they have completed their pharmacy degree.

SHPA believes that many pharmacy interns forgo leave in order to be eligible for oral exams. In addition they cannot take a break on completion of their exams as they may be eligible to be employed as a pharmacist 'at any time'.

Delays in beginning supervised training has flow on effects for the PBA as a greater number of pharmacy interns cannot complete 75% of the required supervised practice hours in time to register for and sit the major oral examinations in October. These applicants must delay their examinations until the following February.

Similarly there are considerable delays and uncertainty in gaining initial registration. Employers often rely on newly registered pharmacists to cover positions over the Christmas / New Year holiday period. The delays and uncertainty is causing considerable angst for employers and potential employees. (It should be noted that these delays may also jeopardise the applicant's ability to find employment in a tight employment market.)

Initial registration of other health practitioners

SHPA does not wish to comment at length on the registration of other health practitioners but notes that the extensive delays and uncertainty surrounding the registration of medical interns is having significant impact in the hospital setting (both public and private hospitals).

Registration through AHPRA is one of many approvals a medical intern requires to practice in a hospital, some of which are dependent on AHPRA approval. A significant issue is that medical interns cannot prescribe medicines through the PBS until they have a provider number from Medicare Australia which requires AHPRA registration. This delay means that other doctors in the hospital must write PBS prescriptions for the interns' patients.

Impact of AHPRA processes and administration on health practitioners, patients, hospitals and service providers

As noted earlier the delays and uncertainty with registration is frustrating for both employers and the employee. Service providers cannot guarantee service availability or cover for other staff on leave as they could when registration was closely linked with the timing of the oral examination.

The PBA's dependence on evidence from third parties and differing work practices across AHPRA offices means that applicants that submit their documents for initial registration on the same day may gain registration weeks apart. It would be very helpful if PBA / AHPRA could guarantee a reasonable, fixed processing time.

As noted above a significant issue related to registration is that medical interns cannot prescribe medicines through the PBS until they have a provider number from Medicare Australia which requires AHPRA registration. **This delay means that other doctors in the hospital must write PBS prescriptions for the interns' patients.** This has obvious work practice issues but also **increases the chance of prescribing errors** as two medical practitioners are writing prescriptions for one patient.

Response time to individual registration enquiries

Previously pharmacists could contact a local pharmacy registration authority with any enquiries. Under the current system individual boards cannot be contacted directly and all enquiries are handled through the AHPRA umbrella. This means that a problem relating to one profession that consumes considerable resources has flow on effects to the service to all the professions under the AHPRA umbrella.

Anecdotally applicants, pharmacy preceptors and pharmacy managers have reported considerable problems and frustration with enquiries to AHPRA. These can be categorised as:

- delays in getting though the telephone enquiry number, particularly at peak times such as the end of the academic year or Board examinations or when there is a problem relating to one of the professions
- lack of knowledge about the multiple application and approval processes for individual professions
- lack of information about why an application is delayed
- lack of information about when an application may be approved

Work is required on triaging and referring enquiries and ensuring that if a query cannot be answered to the satisfaction of the customer it is referred immediately to the relevant Board.