



The Pharmacy
Guild of Australia

**Response to the Consultation Paper on
Proposed arrangements for accreditation
for the National Registration and Accreditation Scheme for health professions**

December 2008

The Pharmacy Guild of Australia
PO Box 7036
Canberra BC ACT 2610
tel: 02 6270 1888
fax: 02 6270 1800

Proposal No.	Brief Description of Proposal	Proposal	Comment
3.1	Key features of proposed accreditation system	<p>The key features of the accreditation system are:</p> <ul style="list-style-type: none"> (a) development of accreditation standards; (b) assessment of individual education and training courses and institutions against the standards; (c) assessment of overseas accrediting authorities to determine whether the courses they accredit provide the required knowledge and skills to practise in Australia; and (d) assessment of individual overseas trained practitioners qualified in courses which are not recognised in Australia. 	Satisfactory. However, in regard to 3.1.(b), the scope should be constrained to the assessment of individual education and training courses that are part of the requirement for registration.

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3.4.1 3.4.3	Recognition of specialties and accreditation of specialist training	<p>National boards will consider whether there is a need for specialist endorsements in their profession.</p> <p>The Ministerial Council will need to agree to any proposal.</p>	<p>The Australian Association of Consultant Pharmacy (AACP) is an approved accreditation and credentialing body for pharmacy professional cognitive services that are remunerated separately from supply of medicines such as accrediting pharmacists as being competent to perform medication reviews in both residential aged care facilities and the home setting.</p> <p>AACP also credentials pharmacists for associated support services under the Fourth Community Pharmacy Agreement such as Diabetes Medication Assistance Service and Asthma service.</p> <p>The Guild would support the AACP to provide necessary credentialing services for pharmacy services under the national scheme should the national board decide that such services were to be endorsed and/or that external accreditation bodies be delegated to undertake additional functions.</p>

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3.4.4 3.4.5 3.4.6 3.4.7 3.5.1 3.5.2 3.5.3 3.5.4 3.5.5 3.5.6 3.5.7 3.5.8 3.10.1 3.10.2	<p>External accreditation bodies</p> <p>Accreditation processes</p>	<p>Boards will generally be able to delegate accreditation functions to external bodies.</p> <p>The roles of an accreditation body are to include:</p> <p>(a) development of accreditation standards through a consultative process for consideration by the board and then the Ministerial Council;</p> <p>(b) assessment of courses of study to determine whether they meet approved accreditation standards and advise the relevant board;</p> <p>(c) assessment of accrediting authorities in other countries to determine whether they provide practitioners with the required knowledge and clinical skills to practise in Australia and advise the relevant board;</p> <p>(d) provision of a review process for decisions made in relation to the accreditation of education courses and institutions; and</p> <p>(e) oversight of the assessment of the knowledge and clinical skills of overseas trained practitioners whose basic qualifications are not on the list of approved courses of study and make recommendations to the board's registration committee regarding the suitability of an applicant's knowledge and clinical skills for registration in Australia and advise the relevant board in respect to an individual's application for registration.</p>	<p>While it would appear the Australian Pharmacy Council which currently provides accreditation will be able to continue under the national scheme, it is noted that accreditation standards have to be approved by the Ministerial Council, which will have to take advice from its Advisory Body.</p> <p>The Guild is concerned that the management agency appears to have a disproportionate role in controlling standards through its responsibility for developing the Accreditation Standards Framework (ASF).</p> <p>The Guild has concerns in regard to the relatively limited role of the National Board, compared to the role of the Ministerial Council and the Agency and questions:</p> <p>(a) the need for the Ministerial Council rather than a National Board to approve accreditation standards; and</p> <p>(b) the nature of the role of an administrative agency in developing accreditation standards.</p>

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		<p>Boards may also wish to expand the scope of courses which they accredit. This would involve the development of new accreditation standards for such courses. Such proposals would be submitted to the Ministerial Council for consideration.</p> <p>If agreed, accreditation of these courses would become part of the accreditation functions.</p> <p>The relationship between the Agency and the accreditation body will be specified in a contract, which will include:</p> <ul style="list-style-type: none"> (a) the objectives of the national scheme; (b) the accreditation framework standards developed by the Agency (c) the budget for the accreditation functions it is performing for the national board (d) the contribution to the cost of those functions to be drawn from registration fees (e) monitoring and reporting arrangements (f) requirements relating to contributions to the national board's annual report, and (g) provisions relating to termination of the contract. <p>The accreditation standards framework developed by the Agency following consultation with the boards will set down requirements for the accreditation process which will ensure that good regulatory practice is followed and Ministerial policy directions are met.</p>	

		<p>It is proposed that the Ministerial Council request that the Agency consider the following matters in developing standards for accreditation processes:</p> <ul style="list-style-type: none">(a) the document <i>Standards for Professional Accreditation Processes</i> developed by 'Professions Australia' in consultation with the Forum of Health Professions Councils;(b) the need to meet any relevant international guidelines relating to the specific professions;(c) the need to align standards with relevant international standards and clearly indicate the international standards on which these standards are based when presenting them to boards for consideration; and(d) the need to ensure that accreditation assessment panels provide sufficient public accountability and independence. <p>It is proposed that the legislation provides for ongoing monitoring of education courses and institutions.</p> <p>Accredited service providers will have to report any significant curriculum changes or resourcing issues that would adversely impact on students and compromise their ability to register.</p> <p>The law will require widespread consultation when developing accreditation standards.</p> <p>Finally, the Agency be required to publish on its website, the standards for accreditation following approval by the Ministerial Council as well as all fees and charges related to accreditation.</p>	
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3.7.1	Review Rights	<p>It is proposed that any organisation disadvantaged by an accreditation decision should have the right to have an external right of review.</p>	<p>Further advice is needed as to what is meant by an ‘external right of review’.</p> <p>For example, in NSW, where the Pharmacy Board declines to accredit a course of study, the unsuccessful institution can have the decision reviewed by the Administrative Review Tribunal.¹</p> <p>The proposal needs to indicate which model the scheme plans to adopt.</p>
3.8	Indemnity	<p>It is proposed that the national scheme legislation will provide that all bodies and their agents under the scheme will be indemnified for work performed in relation to the scheme.</p> <p>These indemnity arrangements will extend to external accreditation bodies and committees and persons acting for those bodies and committees.</p>	Agreed.

¹ Subsection 8(4) of the *Pharmacy Practice Act 2006*

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3.9	Funding arrangements	The IGA anticipates that ultimately the national scheme will be funded from fees received from registration functions and accreditation functions.	<p>The Guild is pleased to note that stakeholder views have been taken into account in this paper, specifically in regard to:</p> <p>(a) registration and accreditation activities should not be cross-subsidised between professions; and</p> <p>(b) fees for each profession should be set at a level that supports the regulatory activities for that profession only.</p> <p>The Guild agrees that common overhead costs should be allocated across professions.</p> <p>It is suggested that the method of calculating the manner by which fees are calculated should be set out in regulations made under the National Law, in a provision similar in nature to paragraph 98(3)(u) of the <i>Civil Aviation Act 1988 (Cth)</i>.</p>

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4.1	Linkages with Commonwealth, State and Territory government bodies	<p>It is expected that there will be operational linkages between State and federal education departments and tertiary education accreditation bodies, both in the university and the vocational education and training sectors, as appropriate.</p> <p>It is therefore proposed that accreditation reports will be made publicly available in the Agency's annual report and on its website.</p> <p>These reports will include recommendations and outcomes of accreditation processes and information on education and training courses.</p>	The proposal appears to be satisfactory. However, as a registered training organisation (RTO), the Guild needs more detailed information on the impact of the operational linkages.
5.1	International linkages	<p>Submissions have emphasised the importance of ensuring that education and training of health professionals is consistent with that of other similar nations.</p> <p>Governments have a particular relationship with New Zealand under the <i>Trans-Tasman Mutual Recognition Act 1997</i>.</p> <p>It is proposed that the national scheme legislation provide that standards for accreditation are developed in consultation with New Zealand and any other country with which Australia has (or develops) a mutual recognition agreement.</p>	Agreed.

Proposal No.	Brief Description of Proposal	Proposal	Comment
6.1	Transitional arrangements	<p>(a) current boards to provide the new national boards with their lists of accredited courses prior to the commencement of the national scheme standards for courses or education providers which exist on 30 June 2010, to continue until they are replaced with standards developed under the national scheme and approved by the Ministerial Council</p> <p>(b) education and training courses and education providers which are accredited by the current boards on 30 June 2010 to be deemed to be accredited under the national scheme until they have been re-accredited under the new provisions; and</p> <p>(c) lead times of at least one full year for the introduction of any new accreditation standards following approval by the Ministerial Council to allow course providers to make any required changes to their courses.</p>	The proposal is satisfactory.