

***National Registration and Accreditation Scheme
for the Health Professions***

Proposed Registration Arrangements

***Submission by the
Pharmaceutical Society of Australia***

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The Pharmaceutical Society of Australia (PSA) is the organisation that represents the professional interests of pharmacists across the nation. It provides standards of practice, education, training and practice support for pharmacists and helps members of the profession to deliver quality health care to consumers.

PSA takes this opportunity to provide a submission on the proposed registration arrangements for the National Registration and Accreditation Scheme for the Health Professions.

PSA's comments are presented in table format with cross referencing to the relevant section of the consultation paper.

Page no.	Proposal no.	Comments
6	4.1.1	As this initiative is partly intended to reduce duplication and increase efficiencies, the final fee for the profession will be of major interest. PSA would be very concerned if there is any significant increase in the cost of the registration process for the profession.
7	4.2.1	Is it proposed that points c and d (in particular) will cover international jurisdictions? Will there be a requirement to present evidence of coverage by professional indemnity insurance following acceptance as a new registrant or when renewing an existing registration?
7	4.3.1	At the present time, the pharmacy profession has reasonable concerns with the impact mandatory criminal checks may have on the timeliness of the registration process and the registration fees. Taking the above into account and balancing it with public safety considerations, PSA's preference is Option 3.
10	6.2.1, point c	Will sitting fees and allowances for committee members be consistent across all boards?
13	7.1, Table 2	It is not clear how a person holding a specialist endorsement on their general registration would differ from a person granted specific registration under the "recognised specialist qualification and experience" sub-type. Under specific registration, is it necessary to have all of the listed sub-types? For example, could "post-graduate supervised practice or training" (sub-type c) and "internationally trained specialists" (g) be grouped together? Similarly could "examination candidates" (sub-type d) be included under sub-type a, "provisional" registration? Under student registration, it may be worth explicitly including "interns" who are out in the (pharmacy) workforce but have yet to complete their registration exam.

14	7.3.1	PSA believes it would be preferable to include a non-practising category of registration for all boards. Making it optional appears to be contrary to the basic principles underpinning the implementation of a national registration scheme.
15	7.4.1	Student registration is an attractive proposal from a standards and quality perspective. However, PSA sees it as a potentially large and expensive undertaking and is concerned about potential costs and logistics. We therefore do not support Option 3.
20	9.2.2, point a	In relation to competence requirements, PSA notes the proposal to enable the national boards to “develop and publish minimum standards”. PSA is the custodian of the competency standards for pharmacists and as such, is responsible for the development of these standards on behalf of, and in consultation with, the pharmacy profession. We therefore seek assurance that any new legislation does not hinder PSA’s ability to fulfil this key responsibility.
25	11.1.1	Not having a standard registration period is likely to be convenient for practitioners. However, PSA believes it will present an administrative burden for employers in checking their employees’ registration renewal status and may result in a less efficient system overall.
26	11.3.1	PSA agrees with the provision for a three month ‘grace’ period. Perhaps consideration could also be given to the introduction of a penalty for late renewals.
27	11.4.1	PSA supports the proposal on reinstatement to the register. PSA does not support the alternative option.

(End of submission)