

**SUBMISSION BY THE PHARMACEUTICAL SOCIETY OF AUSTRALIA TO THE
PHARMACY BOARD OF AUSTRALIA'S CONSULTATION PAPER ON
REGISTRATION AND RELATED MATTERS**

BACKGROUND

About PSA

1. The Pharmaceutical Society of Australia (PSA) is the peak national professional pharmacy organisation representing some 75 per cent of pharmacists across Australia. PSA's core functions are: supporting pharmacists' commitment to high standards of patient care; providing continuing professional development (CPD), education and practice support; and representing their role as frontline health professionals.

PURPOSE

2. The purpose of this submission is to provide comment on the *Consultation paper on registration standards and related matters* (dated 27 October 2009) circulated by the Pharmacy Board of Australia (the Board).

GENERAL COMMENTS

3. PSA welcomes the Board's consultation paper and appreciates the opportunity to provide comment on its proposals. Comments are provided below against each of the proposed standards.

4. As a general comment, PSA is concerned to note that considerable detail around the operation of certain key standards is to be included in yet to be developed guidelines, which limits our capacity to provide meaningful and informed comment. This is of particular concern with regard to proposed standards 2.4 (Continuing Professional Development) and 3.3 (Examinations for general registration), for which the consultation paper notes that the Board "will publish" guidelines. PSA believes that it is essential that stakeholders be afforded the opportunity to comment on and provide input to these guidelines prior to promulgation by the Board.

COMMENTS ON INDIVIDUAL STANDARDS

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Proposed standard 2.2 English language skills

8. PSA notes that this standard is proposed to be used by all registration boards. The Board is seeking feedback on the following issues:

whether Australian graduates should have a minimum score of 7 in the International English Language Testing System (IELTS) academic module or equivalent at entry to an accredited pharmacy course with an expectation that by completion of the intern year applicants for registration would have achieved competence in English at IELTS at level 7.5 academic module or equivalent

9. PSA supports the above proposal but suggests that consideration could also be given to the use of other recognised assessment tools including Test of English as a Foreign Language (TOEFL) in addition to IELTS.

whether the achievement level should be set at 7.5 in the IELTS academic test

10. PSA supports the above proposal.

whether the Board should also accept a pass in the Professional Linguistic Assessment Board (PLAB), or a pass in the New Zealand Registration Examination (NZREX) in New Zealand.

11. PSA supports the above proposal.

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SUMMARY

25. PSA welcomes the Board's consultation paper and appreciates the opportunity to provide comment on its proposals. PSA looks forward to working with the Board in the further refinement of its proposals and would be pleased to assist the Board in the development of guidelines and other supporting material.

Prepared by:

Pharmaceutical Society of Australia

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24 November 2009