

. The Pharmacy Board of Australia is inviting feedback on its draft revised Guidelines for compounding of medicines (the draft revised guidelines). Optional questions have been provided below and you may wish to address some or all of these in your response.

Please note this survey contains the same questions as the response template (Word document). Please choose only ONE method of responding to avoid duplicating your submission.

. Please provide your details below

Name	<input type="text" value=""/>
Organisation name (if applicable)	<input type="text" value="Sydney University School of Pharmacy"/>
Contact email	<input type="text" value=""/>

. Published submissions will include the names (if provided) of the individuals and/or the organisations that made the submission unless confidentiality is requested.

Do you want your responses to be published after public consultation?

- Yes
 No

. When providing feedback, please include the relevant guideline number/section that your feedback refers to.

. The revised compounding guidelines include additional content on medicine supply pathways to consider before deciding if it is appropriate to compound a medicine (Guideline 1 When to compound medicines)

Q1. 1. Is the new content on medicine supply pathways clear and helpful? Why or why not?

. When providing feedback, please include the relevant guideline number/section that your feedback refers to.

. The compounding guidelines advise that a copy of the formula for their compounded medicine (listing all active ingredients and their strengths, and all inactive ingredients) must be provided to the patient when requested (Guideline 13 Supporting informed patient choice). Providing patients with information about the ingredients in their compounded medicine will support patient choice and safer patient outcomes.

Q2. 2. Do you agree that the formula for their compounded medicine must be provided when requested by the patient? Why or why not?

We suggest that formula of compounded medicines SHOULD be provided at each dispensing either hard copy or electronically IF the details can't be added to the label. Consumers with allergies etc should know before using, not have to request later. This is also in line with consumer expectations on provision of CMI's

. **When providing feedback, please include the relevant guideline number/section that your feedback refers to.**

. The revised compounding guidelines include content that is specific to medicines compounded for animal patients.

Q3. 3. Is the new content that is specific to medicines for animal patients clear and helpful? Why or why not?

Suggestion that the guidelines include a risk assessment along the lines developed by the AVA which would allow pharmacists to better assess whether they possess the skills and competency to properly risk assess the compounding of veterinary products. The APF doesn't give clear enough guidance on veterinary compounding. Aligning to AVA document <https://www.ava.com.au/siteassets/policy-and-advocacy/policies/use-of-veterinary-medicines/guidelines-for-the-preparation-and-use-of-compounded-pharmaceuticals.pdf>

. **When providing feedback, please include the relevant guideline number/section that your feedback refers to.**

Q4. 4. Is there any content that needs to be changed, added or deleted in the revised guidelines? If so, please provide your suggestions and reasons.

We believe it would be beneficial to include guidance around 3rd party supply arrangements eg circumstances where it may be appropriate such as cold chain supply to a remote area, where supply to a pharmacy for collection may be necessary, whilst reiterating that the person compounding has responsibility and should have direct patient contact for each dispensing.

Q5. 5. Is the language of the revised guidelines clear and is the structure helpful? Why or why not?

Guidelines are clear when read in conjunction with the case studies. We hope these will be a feature of the final guidelines not provided as an appendix, as these provided clarity.

Q6. 6. Please provide any other feedback about the revised guidelines.

. **When providing feedback, please include the relevant guideline number/section that your feedback refers to.**

. The Board proposes to retire the Professional practice profile for pharmacists undertaking complex compounding, as a professional practice profile should be practitioner specific, describe an individual's scope of practice and is not common to all pharmacists undertaking complex compounding. Individuals should develop their own practice profile by selecting the relevant competencies from the competency standards and customising them for use in their own practice setting.

Q7. 7. Do you agree with the Board's proposal to retire the currently published *Professional practice profile for pharmacists undertaking complex compounding*? Why or why not?

Agree- This can be dealt with as part of the pharmacists self-assessment of scope of practice

. The Board developed the fact sheet to provide helpful context for members of the public and support their participation in this consultation.

Q8. 8. Should the Board publish the fact sheet on its website for pharmacists and members of the public to access? Why or why not?

Yes, the board should publish the fact sheet for transparency

. Thank you for your feedback. Please click on the NEXT button below to finalise your response.