

Recertification Framework – Questions and Answers

Please read the Recertification Framework document available [here](#)

Council welcomes your questions; please direct them to j.moginie@pharmacycouncil.org.nz. Instead of responding to individual emails, we will create Questions and Answers (Q & As) from common themes, so this document will grow as more questions and answers are added.

Some answers will not be known yet. This is because we have prioritised development of the requirements themselves. Aspects of delivery of the Framework will follow. From June 2020 to March 2021, the Council team will be finalising the information and mechanisms you will need to begin using the Framework in April 2021, including technology for recording activities, guidance and support for meeting the requirements, and transition from existing to new frameworks. We will keep you posted and provide more answers as we finalise each of these components.

Q & As use these broad headings:

- I want to understand more about the Framework
- I'll need some guidance on how to meet the requirements
- I want to understand more about the verifying pharmacist role
- Where will I record evidence that I have met the requirements?
- My application for a practising certificate
- Transitioning from the existing requirements to the new framework
- Other

I want to understand more about the Framework

Q: Why have requirements changed?

A: Council believes it can, and should, strengthen the assurance it provides to the New Zealand public where it can reasonably do so. After considering a wide range of New Zealand and international thinking on this subject, we have selected recertification requirements that are likely to have a more direct impact on competence than a reliance on learning alone.

The process of setting recertification requirements for the purpose of ensuring competence is enshrined in New Zealand law. Until now we have placed heavy reliance on participation in self-selected learning as a proxy for maintaining competence. Regulators here and overseas are increasingly being required to demonstrate their effectiveness. We wanted to improve the effectiveness of our current public assurance. We believe that if we keep the requirements as they are, our assurance will be weaker, because of our heavy reliance on self-selected learning, than it could be if pharmacists' recertification actions had a more direct impact on competence for their role.

There are many peer-reviewed papers relating to competence assurance. We sought views from many sources, including respected international academics, material informing the UK General Pharmaceutical Council's 2018 revalidation framework, and material used by the NZ Dental Council in its recertification requirements' renewal. We talked to other New Zealand health profession regulators, as well as international pharmacy regulators, and compared pharmacy requirements for Australia, UK, Ireland and Ontario. We also considered the views of pharmacists who attended Pharmacy Council evening presentations around New Zealand

in 2018. In creating a new framework, we have balanced as far as we can the responsibility of regulation to the public and our desire to be a reasonable and effective regulator of health professionals.

Q: What is the problem Council is wanting to solve?

Other questions included whether the change has arisen from public complaints and whether Council knows what percentage of pharmacists are not practising competently.

A: This change has not been in response to complaints from the public. Council's function is proactive rather than reactive because members of the public do not necessarily have the information they would need in order to know if trust in the profession is justified. This change will strengthen the assurance we can provide; however, we do not think it is reasonable, useful or even possible to assess the competence of every practising pharmacist.

Q: When were pharmacists first advised that the requirements might change?

A: Our [newsletter of July 2019](#) outlined our approach. In 2018 we also introduced our thinking on the subject of competence assurance during evening presentations to practising pharmacists at nine locations around New Zealand.

Q: Have practising pharmacists been involved in the development of these requirements?

A: Yes, a working group of practising pharmacists from different types of practice and different types of roles worked on these requirements to ensure they were reasonable and achievable for all pharmacists. We also held 1-1 conversations with pharmacists who had involvement in current CPD processes and, prior to the framework being developed, we sought views on risk and evidence of competence from attendees at a series of evening presentations for pharmacists through New Zealand.

Q: Are these requirements replacing the existing requirements?

A: Yes, they will do from 1 April 2021.

Q: Are these requirements compulsory?

A: Yes, requirements are compulsory for practising pharmacists (pharmacists with status "Registered, active" on the practising register). A pharmacist on the non-practising register ("Registered, inactive"), is not required to complete the recertification requirements.

Q: What about pharmacists on parental leave?

A: A pharmacist on parental leave and who is also on the non-practising register will not be required to meet the recertification requirements.

I'll need some guidance on how to meet the requirements

Details of guidance have yet to be finalised.

Q: How will I know exactly what I have to do to meet a requirement?

A: Council will provide you with guidance which will be created in upcoming months. For some activities we envisage guidance might include information, a template and an example. Details of guidance and support have not yet been finalised.

Q: Who can be included in a peer group? Can some non-pharmacists be members?

A: Our concept of a professional peer group is that it would usually comprise pharmacists but could include other health professionals as well as pharmacists if the knowledge and cases they share is of value to you in your practice as a pharmacist.

Q: Can peer group engagement include attendance at conferences?

A: Our concept of a peer group is that it would usually comprise the same people over time and include activities like journal clubs and sharing learnings from cases, errors and successes. With time we envisage that the trust built up within this group would further support safe practice. A conference would not fit with that concept; however, specific elements of a conference may assist in meeting another of the requirements.

Q: Can you give me more detail about the selection of standards for a written reflection?

A: For the written reflective account, we will ask pharmacists to either reflect on a critical incident they have experienced in their practice or write a reflection on how they demonstrate one or more from a small number of competence standards that the Pharmacy Council will provide each year. The idea of limiting the list of standards to choose from is to encourage pharmacists to think about different standards through the years, rather than the same ones.

Q: What if the things I want to learn about don't fit into the recertification requirements?

A: Recertification requirements shouldn't limit your learning. Competence standards include a commitment to lifelong learning but Council does not require you to report all your learning to us. We are asking you to complete for us a small number of carefully chosen activities for which there is evidence of an effect on competence for your role.

Q: Will cultural safety aspects go beyond Māori to cover all cultures and acknowledge age-related and gender-related cultures, amongst others?

A: Details of guidance have not yet been confirmed but our concept relates to all cultures, in line with the competence standards, emphasising reduction of health inequities and pharmacists' obligations under Te Tiriti o Waitangi.

Q: Without points, how will I know when I've done enough to meet the requirements?

A: For most of the six types of activity, you only need to demonstrate you have taken one action. Two professional development cycles and two meetings with a group of professional peers are required. Council's intention is that recertification requirements should drive competence; it's focus is quality not quantity.

Q: What timing constraints will be in place for completion of requirements each year?

A: We are hoping not to be too prescriptive on this, but to align with the intent of the framework, a professional development plan would need to be completed early in the 12 month period so that it drives actions during the year. At the other end of the year a verifying pharmacist makes their statements in a pharmacist's online record once all the requirements have been completed, and prior to the pharmacist's APC application, so ideally pharmacists will plan this sequence to avoid a rush in the final weeks.

I want to understand more about the verifying pharmacist (verifier) role

Q: How should I select my verifier?

A: Your verifying pharmacist should be familiar with the type of work you do, should be an experienced pharmacist and, ideally, should know you well. If your workplace manager is a pharmacist, that person might be the natural choice for your verifier because they will know you well and are already invested in your competence. Selection is by invitation and pharmacists may accept or decline the invitation. If you have difficulty securing a verifier, we will provide guidance to assist you.

Q: My pharmacist work is unusual so how will I find a suitable verifier?

A: Where possible we want people to invite pharmacists who are familiar with their type of work to be their verifier. In most cases this will be someone who has, or has had, a similar

role in the same setting or a similar setting. Where that is not possible, then the important thing is that they can come to an understanding of, and can conduct a helpful discussion relating to, the parts of your role that relate to practising in the Pharmacist scope.

Q: How will the verifier role work for locums? Or pharmacy managers?

A: Locum pharmacists and some pharmacy managers who don't report to a pharmacist, will invite someone who is an experienced pharmacist in the same type of practice (eg another community pharmacist) to be their verifier. Where a locum's verifier is in a different region, conversations are likely to occur mostly by phone or online, rather than in person.

Q: What's the difference between the current learning partner role and the new verifying pharmacist role?

A: If the learning partner is an experienced pharmacist who has been supportive, perhaps at times challenging, and even developed into a mentor over time, they may be a good verifier. However, a verifying pharmacist more explicitly strengthens Council's assurance that a pharmacist's professional development choices have been relevant to their role and their own competency needs.

Q: Can my verifier be the learning partner I've had for the past few years?

A: Yes, if they meet the criteria.

Q: Can spouses be each others' verifiers?

A: Yes, if they meet the criteria.

Q: Does a verifier have to be a pharmacist?

A: Yes, registered in the Pharmacist scope of practice.

Q: Are verifiers going to be paid?

A: No

Q: If I am a verifying pharmacist, will the Council hold me accountable for the statements I make about a pharmacist?

A: No, the Framework is not set up to punish individual pharmacists or hold a pharmacist accountable for the competence of another. Its intent is to support the profession in attaining and maintaining the knowledge and skills it needs to be safe and effective across a range of roles and levels of responsibility. Council hopes pharmacists will be eager to be verifiers for others. We trust you and your pharmacist to engage professionally in a relationship whose purpose is to support optimal competence and outcomes for users of pharmacists' services.

Q: Is there legal accountability for the verifier role?

A: Council has been clear that it does not and would not hold a pharmacist responsible or accountable for the competence or actions of another pharmacist. We do not request an evaluation of competence, for example, and we use language: "to the best of my knowledge..." that accepts a verifier may not know the situation absolutely. The verifying pharmacist helps give Council confidence that the activities a pharmacist has recorded relate to their workplace role in the Pharmacist scope. We expect that both pharmacist and verifier will act in good faith, in line with the intent of the Framework, and that providing the verifier statement will be straightforward for the vast majority of pharmacists. We have checked this answer with Council's legal counsel.

Q: What will be the minimum period required between the two meetings per year?

A: We don't intend to specify a period but rely instead on your professional judgement about what would reflect the intent of the Framework.

Q: Has the Council considered the power imbalance in the employer/employee situation?

A: An employee pharmacist is not – and should not be - compelled to invite their manager to be their verifying pharmacist. We will monitor the Framework and assess concerns of this nature that are reported to us. Some of the concerns may refer to issues already existent in a workplace and might normally be matters for resolution through employment mediation or legal processes. Some can be notified to Council because they relate to professionalism under the standards and code of ethics applying to pharmacists.

What technology will I use to record evidence that I have met the requirements?

Q: Has the online technology been decided yet?

A: Not yet. Council is conducting a formal procurement process for an online programme that will hold a record of the activities we ask you to complete and allow input by your verifier. Development of the technology will happen in the later part of 2020.

Q: Does your approach allow for multiple providers of technology and support and guidance functions?

A: We anticipate there will be one technology provider because of the significant Council resources needed to ensure a programme meets Council's specifications. Details for support and guidance provision have yet to be worked out.

Will my online application for a practising certificate change?

Q: When I apply for my practising certificate in March 2022, what checks will be made before I am issued with my APC?

A: The online APC application process will seem largely similar to previously. For the portion of your online application that relates to recertification requirements, if your declarations to Council confirm you are competent for your role, that your verifier has made their statements in your online record, and you have met the recertification requirements, your application will progress.

Transitioning from the existing framework to the new framework

Q: Now that new requirements are coming, do I have to complete the recertification requirements for 2020-21?

A: Yes. In March 2021 when you apply for a new practising certificate, your application will not progress until you have shown you have met the annual requirements for the 2020-21 year and (if you are competing your 3-year learning cycle in March 2021) your three-year requirements.

Q: Are the new requirements replacing ENHANCE?

A: ENHANCE is not the recertification requirements. Recertification requirements are set by the Pharmacy Council. ENHANCE is the Council-approved online platform and support service provided by the Pharmaceutical Society to deliver the current Council recertification framework.

Technology to implement the new framework will need to meet specifications that are different from the existing ENHANCE platform. Council anticipates that several providers, including the Society, may be interested in engaging in its formal procurement process which is being conducted between June and September. The result of the procurement process will ensure a value for money platform for recording / demonstrating the meeting of requirements.

Guidance and support to help pharmacists meet the requirements will be developed/determined over the next six months.

Other

Q: How much will I need to pay?

A: Council knows costs should be reasonable and for that reason it intends to set the costs for the new Framework at a level lower than what you are currently paying. More information will be known later in 2020, once the results of the technology procurement process are known. In selecting a technology solution, Council will pay close attention to cost and value as well as the quality of experience for users. A robust procurement process is an effective way to test whether the delivery mechanism is the best value for money. This has not been tested since 2012 so the change provides an ideal opportunity to re-test and ensure contracts maintain value for money.

Q: What is involved in your audit process?

A: Each year Council will audit the online documentation of a sample of pharmacists to check that what they have recorded agrees with the statements they made to Council when they applied for their practising certificate. This is similar to the process for our mid-year audit now.

Q: How will the proposed changes make a difference when workplace situations of high workload and stress cause most of the errors?

A: An individual's competency is the knowledge, skills and attributes they need for their role in order to provide best outcomes for users of their services. The Health Practitioners Competence Assurance Act 2003 focuses on an individual practitioner's competence to practise. We acknowledge that other influences may bring about errors or other suboptimal outcomes; however, the recertification process outlined in legislation focuses on practitioner competence.