

16 April 2023

Pharmacy Council
Level 7 / 22 The Terrace
Wellington

Online consultation via: <https://www.surveymonkey.com/r/PCNZopenConsultation>

Dear Sir/Madam,

Re: Submission on the inclusion of one behaviour in the new Pharmacist Prescriber Competence Standards

Thank you for the opportunity to provide feedback on the above consultation.

The Pharmacy Guild of New Zealand (Inc.) (the Guild) is a national membership organisation representing the majority of community pharmacy owners. We provide leadership on all issues affecting the sector and advocate for the business and professional interests of community pharmacy.

We support the reinstatement of the omitted behaviour into competence standard 4 of the Pharmacist Prescriber Competence Standards that will come into effect on 1 April 2024, however, we would like to reiterate our previous comments made during the public consultation on the Pharmacist Prescriber Competence Standards and Guidance in October 2022:

- We believe that the current access criteria and practice requirements are set extremely high when compared to prescriber roles in other health professions. Despite competency around pharmacotherapy and patient assessment skills being core skills required to be a practising pharmacist, the level required for the prescriber role is more intensive when compared with other prescribing professions who utilise the same skills. It should also be noted that most, if not all, prescriber roles have the prescribing competency included in their respective practising scopes, i.e., there is no separate scope required for prescribing.
- The complexity of the entry requirements to enter the prescribing scope creates a massive barrier to those interested and instead serves as a deterrent, rendering the pathway basically useless in alleviating current and future healthcare pressures and shortages.
- There needs to be a serious review of the current role of prescribing pharmacists in the current New Zealand health context – including its scope, position description and education requirements – as the demands have changed significantly in the 10 years since the role was created.

We know that the Council is in the process of reviewing the competency standards for both pharmacists and pharmacist prescribers and believe it is the perfect time to amalgamate these scopes of practice into one. We appreciate that these changes would also necessitate flow-on changes to relevant legislation and to education and training providers. However, given the current climate of change in the New Zealand health sphere, Ministry of Health and Te Whatu Ora, now would be an appropriate time to facilitate these changes.

We are by no means minimising the mahi that the Council have done in creating these standards, but we would like to see the profession evolve with adequate futureproofing to cater to the changing needs of all New Zealanders and are confident that the time is right to pursue a convergence of the role of pharmacist and pharmacist prescriber into a bespoke scope that meets the current needs of our healthcare system and its users.

Thank you for your consideration of our response. If you have any questions about our feedback, please contact our Senior Advisory Pharmacists, Martin Lowis (martin@pgnz.org.nz, 04 802 8218) or Cathy Martin (cathy@pgnz.org.nz, 04 802 8214).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'N. Rickman', with a stylized flourish at the end.

Nicole Rickman

General Manager – Membership and Professional Services