



australian  
pharmacy  
council

## Pharmacy Program Accreditation Guide

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October 2021 | Version 1.1

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## List of Abbreviations

<b>Term</b>	<b>Meaning</b>
<b>AC</b>	Accreditation Committee
<b>Ahpra</b>	Australian Health Practitioner Regulation Agency
<b>APC</b>	Australian Pharmacy Council
<b>ASQA</b>	Australian Skills Quality Authority
<b>CEO</b>	Chief Executive Officer
<b>CPD</b>	Continuing professional development
<b>Eoi</b>	Expression of interest
<b>ITP</b>	Intern training program
<b>MR</b>	Monitoring requirement
<b>NoC</b>	Notification of change
<b>NRAS</b>	National Registration and Accreditation Scheme
<b>PharmBA</b>	Pharmacy Board of Australia
<b>QA</b>	Quality assurance
<b>SET</b>	Site Evaluation Team
<b>TEQSA</b>	Tertiary Education Quality and Standards Agency

# Pharmacy Program Accreditation Guide

## Purpose

This guide describes the processes used by the Australian Pharmacy Council (APC) to:

- accredit pharmacy degree and intern training programs in Australia on behalf of the [Pharmacy Board of Australia \(PharmBA\)](#)
- accredit international pharmacy degree programs.

## Background

### The role of APC

The APC is the national accreditation authority for pharmacy education and training. We do this on behalf of the [Pharmacy Board of Australia \(PharmBA\)](#) under the [National Registration and Accreditation Scheme \(NRAS\)](#).

### Purpose of accreditation

We accredit pharmacy programs by reviewing them to confirm that they meet outcome focused, evidence-based standards. The [Accreditation Standards for Pharmacy Programs in Australia and New Zealand 2020](#) have been developed by us, and approved by PharmBA, to be the standards used to assess degree and intern training programs in Australia. The Standards assure the quality of pharmacy programs and ensure that program graduates are able to meet defined performance outcomes and practise pharmacy safely and effectively. We maintain our Accreditation Standards to ensure they are robust and contemporary.

Our Standards support the development of future-focused pharmacists and enable innovation in pharmacy education. We work to ensure that pharmacy program graduates possess the knowledge, skills and attributes which enable them:

- at the end of a **degree program** to commence practice safely and effectively under the supervision of a preceptor in their intern year
- at the end of the **intern year** (which includes the completion of an intern training program) to practice safely and effectively without supervision in pharmacy practice settings.

The Standards also ensure that pharmacy training produces graduates who will practice in a socially accountable manner and deliver person-centred care to all patients.

For example:

- ensuring cultural safety in professional practice
- addressing the health needs of patients from culturally diverse backgrounds
- improving Aboriginal and Torres Strait Islander health outcomes
- working collaboratively with other health professionals
- developing practitioners with a focus on person-centred care.

Further details on the standards are included later in this document.

To be eligible to become a registered pharmacist, individuals must complete an accredited and approved degree program of study. That is, the pharmacy program must be both accredited by us and approved by the

[PharmBA](#). Graduates are then eligible to commence their intern year, which includes a period of supervised practice, completing an accredited intern training program (ITP) and undertaking the registration exams.

Please [click here](#) to see the current list of APC accredited programs.

## Other regulatory requirements

In addition to meeting our accreditation and PharmBA approval requirements, organisations delivering accredited programs may also need to meet the regulatory requirements of other statutory bodies. They include:

- [Tertiary Education Quality and Standards Agency \(TEQSA\)](#)
- [Australian Skills Quality Authority \(ASQA\)](#)

We regard the role of accreditation as an integral part of the higher education quality framework. We expect pharmacy schools to have in place mechanisms for self-review consistent with universities' quality frameworks and TEQSA requirements. We are mindful of avoiding excessive 'overlap' with other statutory bodies when gathering information as part of the accreditation process. However, we reserve the right to ensure that we are able to conduct our reviews in a manner which allows us to inquire into any aspect of pharmacy schools and ITPs, and to allow us to make independent recommendations and conclusions.

## Accreditation standards

### Accreditation Standards for Pharmacy Programs in Australia and New Zealand 2020

We assess pharmacy degree and intern training programs in Australia and internationally against the 38 criteria of the [Accreditation Standards](#). The Standards are structured in 5 domains:

- safe and socially accountable practice
- governance and quality
- program
- student/intern experience
- outcomes and assessment.

Each domain comprises:

- a Standard (statement) outlining the scope of the domain
- criteria against which education providers will provide evidence of compliance

The Standards have been developed through a wide consultation process involving key stakeholder workshops and successive phases of public consultation. They are accompanied by a [Performance Outcomes Framework](#) and [Supporting Documents](#) which were also produced with input from stakeholders.

### Australian degree and intern training programs

We accredit Australian degree and intern training programs against the Accreditation Standards and advise the PharmBA of our accreditation decisions.

### International degree programs

We accredit international degree programs against the Accreditation Standards. International programs and providers that meet our specific criteria to be considered for international accreditation (including that the

program is taught entirely in English) are required to meet all of the criteria in the standards, with the exception of Criterion 2.2 and 3.4. Graduates of internationally accredited programs are not eligible for the same PharmBA registration process as graduates of Australian programs.

## Standards: Performance Outcomes Framework

The [Performance Outcomes Framework](#) (POs Framework) accompanies the Standards used for degree and intern training programs. It describes the POs to be achieved and demonstrated by students/interns at two distinct milestones in their continuum of learning and development throughout the education pathway. The milestones are as follows:

1. completion of an approved Australian pharmacy degree program capable of leading to general registration
2. the point of general registration as a pharmacist, following the completion of all elements of the intern year.

The POs have been structured into 5 domains which align with the 5 domains of the [National Competency Standards Framework for Pharmacists in Australia 2016](#):

- professionalism in practice
- communication and collaboration
- professional expertise
- leadership and management
- research, enquiry and education.

## Standards: Supporting Documents

The [supporting documents](#) include three separate resource guides in a single document. They are provided as additional guidance for education providers on program accreditation standards as follows:

- **Evidence Guide** for use with the Standards - provides evidence descriptors and evidence examples of how a provider could demonstrate compliance with each criterion
- **Guidance Document** for use with the POs Framework - outlines possible types of assessment and other activities which may be appropriate evidence for each PO
- **Pharmacy Learning Domains** - outlines the content expected to be included in the curricula of accredited pharmacy degree programs.

## Accreditation decision making

### Accreditation Committee (AC)

Our AC makes accreditation decisions that align with the [Health Practitioner Regulation National Law](#). The AC meets up to 6 times each year and operates in accordance with our Board's [Accreditation Committee By-Law](#). The AC activities include the following:

- accreditation decisions for Australian pharmacy programs
- accreditation recommendations to the APC Board for international degree programs to allow them to accredit international programs.

AC membership includes external stakeholders and individuals with relevant expertise across the pharmacy profession, academia, and the community, as outlined in the [Accreditation Committee By-Law](#). This enables the AC to make robust decisions and recommendations on the accreditation of pharmacy programs in Australia and internationally.

Our staff provide advice to the AC based on evidence and precedence to allow them to make their accreditation decisions. The AC reports to the APC Board through the APC Chief Executive Officer (CEO) when required.

### Site Evaluation Team (SET)

We appoint a [SET](#) of external members with specific skills and expertise to undertake accreditation assessments.

The role of the [SET](#) is to assess a program/provider against the Accreditation Standards and prepares a report for our AC to help them make an accreditation decision. They do this by:

- reviewing the written application and supporting documentation
- undertaking a site visit (if required)
- preparing a report for the AC on their assessment of the program against the relevant criteria of the Standards (the 'SET Report').

### SET Member Register

We maintain a register of individuals who have the relevant knowledge and skills to be a SET member (either pharmacy academics, pharmacy teaching staff or practising pharmacists). Periodically we run an Expression of Interest (Eoi) process to allow individuals to apply for inclusion on the SET Member Register.

If you would like to apply to be included on our SET Member Register and be considered for future SETs, please contact our Accreditation Team at [accreditation@pharmacycouncil.org.au](mailto:accreditation@pharmacycouncil.org.au) to find out when our next Eoi process will take place.

### SET Selection Criteria

Individuals on our SET Member Register are appointed to a specific SET according to our [SET Selection Criteria](#) and with consideration of any potential conflicts identified by the education provider.

## SET members

The composition of a team depends on the type of program and assessment type.

*Table 1 Team composition for the accreditation assessment of pharmacy programs*

Team composition	Degree program SET (Aust/Int)	ITP SET (Aust)	External review (Notification of change or new program)
External members	3 external members	2 external members	2 external members
	a senior academic who acts as the SET Chair a pharmacy academic a practising pharmacist	a pharmacy academic a practising pharmacist	pharmacy academics
APC Auditor	an APC accreditation team member who supports the team		

## Conflicts of interest

We are mindful of the importance of independence in our accreditation work. We select SET members based on the individual expert contribution they bring to the SET and with consideration of any actual or perceived conflicts of interest.

We work with the education provider to identify and manage any possible conflicts. We provide the names of proposed SET members to the education provider and ask them to comment on any perceived conflicts of interest. If no conflicts are declared, we will confirm the SET and arrange for the SET assessment including a site visit (if required).

Our [Conflict of Interest Policy](#) is available on our website.

## Confidentiality

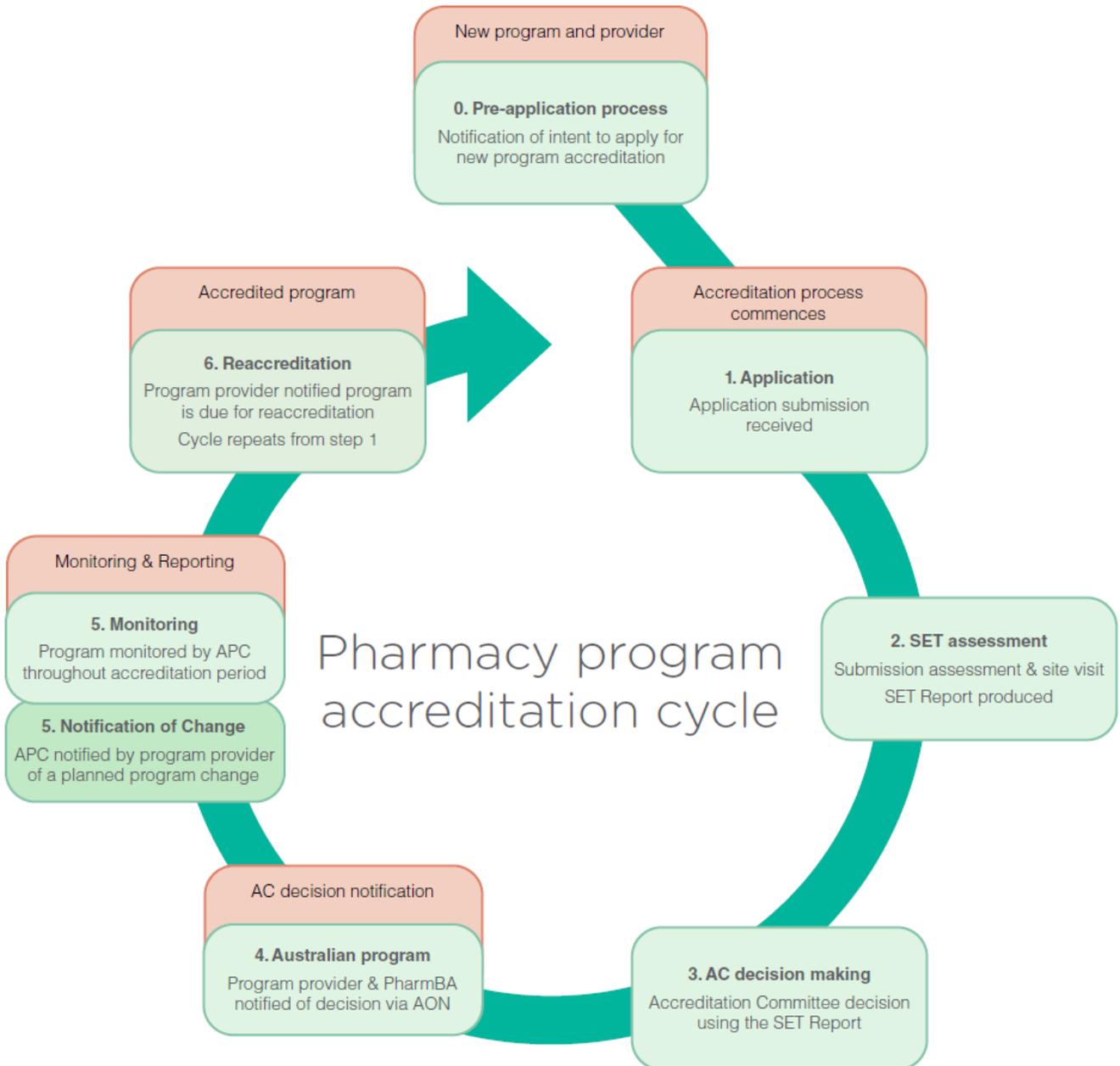
We require all SET members to sign a confidentiality agreement before they are granted access to documentation submitted by education providers.

For further information about SETs and site visits, please see our [website](#).

## Accreditation process

Our accreditation process consists of a number of steps in the 'accreditation cycle'.

Figure 1 APC pharmacy program accreditation cycle



The following section describes each of the steps in the cycle in more detail.

## Step 0: Pre-application process

### Australian programs

Step 0 of the pharmacy program accreditation cycle only applies to new programs. If you are planning to introduce a new program, we recommend contacting us early in the planning phase so we can provide guidance on processes and timelines. This will help you to avoid any delays in the approval process which may delay first enrolments into your accredited program. The APC Accreditation Committee (AC) cannot grant accreditation retrospectively.

We will ask you to submit a Notification of Intent to apply for accreditation of a new pharmacy program form for review.

Once your notification of intent has been reviewed, we will invite you to submit a full accreditation application to apply for accreditation. We will email you the appropriate documents and provide access to our secure Extranet for you to submit your application.

### International degree programs

We require international education providers to submit an [International Accreditation: Expression of Interest \(Eol\)](#) form so that we can evaluate their program for approval to apply for [international degree program accreditation](#).

In your Eol form, you will need to show that:

- your program is taught entirely in English, with an English curriculum  
your program leads to a qualification that compares to an Australian accredited 4-year Bachelor of Pharmacy program
- your university ranks in either Section 1 or Section 2 of the Australian Education International (AEI-NOOSR) Country Education Profile ([email us](#) if you're unsure of your section)
- your university is in a country with a [Smartraveller travel advice](#) of either a normal or high degree of caution.

If we approve your Eol, we will email you the accreditation application template to complete and provide access to our secure Extranet for you to submit your application.

For further details about international degree program accreditation, please see our [International Degree Accreditation Policy](#).

## Step 1: Application

When completing your accreditation application, you should refer to our:

- [Accreditation Standards for Pharmacy Programs in Australia and New Zealand 2020](#)
- [Standards: Performance Outcomes Framework](#)
- [Standards: Supporting Documents](#)

We will provide a template for you to submit your accreditation application. You are able to choose between one of two approaches for your submission (each with their own template):

- a. submission by **'integrated narrative'**:
  - this approach allows you to provide a response to each of the 5 Accreditation Standards domains in an 'integrated' format
  - as there is some degree of overlap between criteria in each of the domains, this allows you to provide a single response to each domain to avoid duplication of responses

- further information about this submission type is provided in the 'integrated narrative' template (available on request)
- b. submission by '**criterion**':
- this approach allows you to provide a response to each of the 38 Accreditation Standards criteria individually
  - further information about this submission type is provided in the 'by criterion' template (available on request).

In addition to an 'integrated narrative' or 'criterion' application, a submission should also include supporting documents. These documents support the claims made in the accreditation application, and will include policies, procedures, curriculum outlines and mapping, templates and feedback results.

When you have completed your accreditation submission, you should upload it directly to our Extranet and email us at [accreditation@pharmacycouncil.org.au](mailto:accreditation@pharmacycouncil.org.au) to confirm that your accreditation submission is ready for us to access.

## Step 2: SET assessment

### Initial desktop review

As soon as we receive your submission, we will review it for completeness. If there is anything missing, we may ask you to either submit specific material, or we may return your entire application and ask you to revise and resubmit it. This will depend on the volume of material identified by us as 'still to be provided'.

We then provide the submission to the appointed team to conduct their initial desktop review of the submission to help prepare and plan for the program site visit (if required).

**Please note:** We treat any information you provide as confidential. All our staff and consultants sign a confidentiality agreement when appointed.

### Site visit (if required)

As part of the accreditation process (including for currently accredited programs seeking reaccreditation), a site visit will take place. The timing and duration of the site visit varies depending on the type of program undergoing accreditation.

- **timing:**
  - new programs: in the final year of the first graduating cohort for each new program
  - existing programs: usually during the final year of the current accreditation cycle
- **duration:**
  - degree program: 3 days
  - ITP: 2 days.

Site visits will usually take place face to face. However, if circumstances prevent a site visit from taking place, we will decide if a 'virtual' site visit is required, using technology such as videoconferencing. Decisions will be made on a case by case basis, in accordance with our policy.

### Site visit schedule

Site visits by a SET are dynamic. They will differ depending on the nature of the program/provider. We will consult with senior staff at your organisation to arrange your site visit schedule. A final schedule will be available before the site visit commences and will include the names of participants in each interview session, and the start and finish times for each session.

You are responsible for ensuring that all relevant staff and students/interns:

- know about the site visit
- are available to speak with the SET at the scheduled time during the site visit.

We encourage all education providers to appoint a representative (a 'meeting facilitator') who will be available during the site visit to assist the SET and to ensure interview attendees are on time for their scheduled interview (whether they are attending either face to face or virtually).

### **Cancelling or rescheduling a site visit**

We may need to cancel or reschedule your site visit if we cannot guarantee the safety of our SET members for any reason. For international programs, this may also occur if [Smartraveller's](#) travel advice for your country changes to a higher alert level.

### **SET interviews**

The site visit involves a series of interviews. We begin with a general program focus and then lead into a more detailed investigation via interviews with key program staff and stakeholders.

During the interviews we speak with:

- staff involved in university and program governance
- specific academic and professional staff
- students/interns
- preceptors
- other external stakeholders.

The main function of the site visit is for the SET to verify information included in the accreditation application and supporting documents to substantiate:

- any apparent gaps in the application relating to program/provider compliance with the Accreditation Standards
- how the provider is 'operationalising' the processes described in the application to meet the Accreditation Standards
- how the unit delivering the program will address any outstanding matters from the previous SET Report
- how the unit delivering the program will maintain or build on its strengths
- how the unit delivering the program plans to address any weaknesses
- the future plans of the unit delivering the program.

For further information about SETs and site visits, please see our [website](#).

### **Site visit location(s)**

In cases where a degree program is delivered at more than one location, or an ITP is offered to interns in more than one state/territory, we will determine the location(s) to be visited by the SET.

We will advise the education provider as part of the site visit planning process about the locations, dates, and times for site visits across multiple degree program locations or for ITPs. This will be determined with consideration of our policy and the specific structures in place for the provider. The final decision is the responsibility of APC and the SET Chair (and will be made on a case by case basis).

The following provides some guidance on the decision-making regarding site visit location.

- **Degree programs**

When an education provider delivers a single program across more than one site, the SET will need to attend all delivery sites which have one or more of the following onsite:

- program leadership (e.g. office of the Head of School)
- program administration (e.g. administrative staff, financial staff, student support staff)
- laboratories
- lecture/tutorial rooms
- program students in attendance at any time during a semester.

A provider that offers an accredited program at multiple sites with a unique course code for each, or allows direct enrolment/entry into each site, will also be considered a separate site for the purposes of a site visit.

If we determine that a degree program provider will require a visit to more than one site, one of the sites will be selected by us as the 'main site' for the purposes of the site visit. This site will likely be the one that hosts program leadership and administrative staff. The duration of the visit is likely to be longer at the main site than for any other site, as more interviews will be held at the main site. All other sites which meet at least one of the criteria listed above will be visited by the SET, but the duration of the visit is likely to be shorter (as there will be some interview sessions that will not require duplication at the additional site(s)).

SET interviews to be held at a second or subsequent campus may involve site specific program staff, students enrolled at the campus, local preceptors and a tour of the facilities.

- **ITPs**

When identifying if a SET needs to undertake multiple site visits to assess your program, we look at several program features. The table below describes the features that would determine if the program requires a visit to a single site with local staff present (option A) or with local and other states/territories staff present (option B):

Table 2 Factors we consider for determining an ITP site visit format

<b>Factors for determining an ITP site visit format</b>		
<b>ITP feature</b>	<b><u>Option A</u> Single site visit</b>	<b><u>Option B</u> Single site visit ('head office') with staff from each administrative site in attendance</b>
<b>Administrative site</b>	Single	Multiple
<b>Funding source</b>	Single	Single
<b>Delivery location</b>	Single	Multiple
<b>Program manager</b>	Single	Single
<b>Contact point for intern communication</b>	Single	Multiple
<b>Curriculum</b>	<i>Not a factor for selecting site visit location/attendees</i>	

### Initial feedback by the SET

After the site visit interviews have been completed, the final session during the site visit is a closing meeting to be held between the SET and the program lead. The program lead may choose to invite one additional individual from the program/provider to the session. During the meeting, the SET Chair will present some preliminary findings of the SET. This will not include the full content of the final SET Report.

Please note this is not an interactive session and program staff are not able to provide additional information to the SET.

### SET Report

The SET will complete a draft SET Report outlining their assessment of the program against the relevant Accreditation Standards criteria.

### Errors of fact (following a site visit only)

We send the draft SET Report to the education provider to give them the opportunity to comment on any errors of fact within the SET Report. No new information or evidence is accepted from the education provider at this stage.

Any submitted 'errors of fact' will be considered and may be used to modify the final SET Report in accordance with our processes on the management of errors of fact. The final SET Report and the submitted errors of fact table will be presented to the AC to allow them to make an accreditation decision.

## Step 3: AC decision making

To allow the AC to make an accreditation decision, the SET Chair (or APC Auditor/Facilitator) presents the final SET Report and submitted 'errors of fact' to the AC and answers any questions from the AC members.

The AC will then make either a decision (for Australian programs) or recommendation (for international programs) regarding the **accreditation status** of the program and the **accreditation period**.

- the AC may also apply conditions and/or monitoring requirements (MRs) to the program (with due dates for reporting) if they require you to address any matters of concern
- the AC may also arrange an additional site visit as part of a 'supplementary audit' as a condition of accreditation (see section 4.4.6 for further details).

### Decision making framework

Our AC uses a risk-based decision making framework for all accreditation decisions which ensures the consistency of decision making processes.

The [Accreditation Committee Decision Making Framework](#) considers the following elements:

- risk
- evidence
- reasonableness.

The AC uses the risk rating framework as a guide to determine the accreditation status to be granted for a program.

Table 3 Risk Rating Framework

<b>RISK RATING FRAMEWORK</b>			
<b>Compliant with Standards</b>	<b>Compliant with Standards (with potential risk of non-compliance)</b>	<b>Substantially compliant with Standards</b>	<b>Substantially non-compliant with Standards</b>
No conditions OR Low volume of conditions/MRs	Low to medium volume of conditions/MRs	High volume of conditions/MRs	Not accredited
Stable program and provider history	Stable program and provider history	Recent history of program and provider instability	Program and provider instability
<b>LOW</b>	<b>MEDIUM</b>	<b>HIGH</b>	<b>EXTREME</b>



The duration of accreditation granted to an individual program by the AC will then depend on the risk rating applied to the program.

Table 4 Maximum accreditation period

<b>Risk rating</b>	<b>Maximum accreditation period granted</b>		
	<b>Aust degree programs</b>	<b>Int degree programs</b>	<b>Aust ITPs</b>
<b>High risk program</b>	1 year	1 year	Up to 3 years
<b>Moderate risk program</b>	Up to 3 years	Up to 3 years	
<b>Low risk program</b>	Up to 6 years	Up to 5 years	

### International degree programs

The AC does not make accreditation decisions for international programs. They make an accreditation recommendation to our Board who makes the accreditation decision.

### Accreditation definitions

Under the [National Law](#), the AC will decide or recommend the accreditation status for the program using the terms from the National Law.

Table 5 Accreditation definitions

Accreditation status	Definition
<b>Accredited</b>	<p>The pharmacy program fully meets all 38 criteria in the Accreditation Standards.</p> <p><i>The program does not have any conditions applied.</i></p> <p><i>The program may or may not have MRs applied. The provider must report against any MRs.</i></p>
<b>Accredited with conditions*</b>	<p>The pharmacy program substantially meets the Accreditation Standards and is expected to fully meet them in a reasonable time frame.</p> <p>Education providers can still deliver these programs, and students can graduate from them with the listed qualification.</p> <p><i>The program has at least one condition applied. The provider must report to us as required.</i></p> <p><i>The program may or may not have MRs applied. The provider must report against any MRs.</i></p>
<b>Not accredited</b>	<p>The pharmacy program is not accredited as it does not meet the Accreditation Standards.</p> <p>In the instance the AC decides not to accredit a program, they will refer their recommendation to our Board.</p>

**\*Please note:** We can only ever accredit international programs with conditions. This is because they cannot meet two of the criteria from the [Accreditation Standards](#).

### Supplementary audit

In some cases, with consideration of risk (and in alignment with the [Accreditation Committee Decision Making Framework](#)), the AC may apply a condition on program accreditation which requires a supplementary audit (including a site visit) to be undertaken. The purpose of a supplementary audit is for the AC to determine that the accredited program continues to meet the Accreditation Standards.

Reasons for a supplementary audit being undertaken may include (but are not limited to):

- the program(s) having a high number of conditions applied to its accreditation
- the education provider submitting reporting that results in the AC having significant concerns about program compliance with one or more Accreditation Standards criteria
- significant concerns by the AC of the program's sustainability including during teach-out.

If the AC decides that we need to undertake a supplementary audit of your program, we will appoint a SET and arrange a site visit. You will need to submit an accreditation application against the specific criteria identified by the AC as areas of concern or non-compliance. SET members will assess the submission prior to the site visit. The schedule and duration of the visit will vary depending on the number of criteria to be interrogated and the number of required interview sessions. The composition of the SET will be determined based on the specific areas of review, and the types of interviews that will be conducted.

The education provider will be charged for the supplementary audit on a cost recovery basis (which will be invoiced after the site visit). The costs will include SET travel and accommodation, SET and AC sitting fees and our staff costs.

After the supplementary audit and site visit, the SET will prepare a SET Report for the AC. We will follow the same reporting and decision making processes as for a full accreditation review.

## Step 4: AC decision notification

### Australian programs

We provide the AC's decision to the education provider via an Accreditation Outcome Notification (AON) within 10 business days of the AC meeting.

If your program is granted accreditation/reaccreditation, we will update the list of accredited programs on our [website](#) to show your program's current accreditation status.

The AC's decision is the final **accreditation** decision and applies from the date of the AON.

For the purpose of the registration of graduates, an accredited degree program must also be **approved** by the PharmBA. We provide degree program AONs to the PharmBA for their approval under [National Law](#). Approval of a program cannot take place until after a program has been accredited.

For the PharmBA [Approved Programs of Study](#) list, please see the [Ahpra website](#).

### International programs

The AC's accreditation recommendation is provided to our Board via an AON for consideration at the next Board meeting. The Board's accreditation decision is provided to the education provider via an AON within 10 business days of their meeting.

If your international program is accredited by us, we will update the list of accredited programs on our [website](#) to show your program's accreditation status once our Board has made its decision.

### Graduates of APC accredited international degree programs

**Please note** APC accreditation of an international degree program does not lead to a pathway for approval as a registrable pharmacist qualification by the [PharmBA](#).

All graduates of APC accredited international degree programs who wish to apply for registration in Australia are required to apply via the existing [skills assessment](#) and registration processes.

### Accredited program logo

Existing accredited program providers and providers applying for accreditation of a new program are required to abide by the requirements of our [Accreditation Marketing Policy](#). When your program is granted accreditation, we will send you our Accreditation Marketing Policy & Logo Agreement for you to sign. By signing the agreement, you are declaring that you have read and understood the [Accreditation Marketing Policy](#) requirements when promoting your accredited program(s). It helps to ensure you market your programs professionally and with integrity.

After you have returned your signed agreement to our [accreditation team](#), we will send you an accredited program logo which you can display in your marketing materials (in accordance with the policy).

We regularly monitor the marketing of accredited programs to ensure that they continue to meet the requirements of the policy.

**Please note:** If your accreditation expires, or is revoked, you must remove the logo and any references to APC accreditation from all program marketing materials and your website immediately.

### Appealing an accreditation decision

If you would like to appeal an accreditation decision made in relation to your pharmacy program by our AC, our [Appeals Policy](#) outlines the process.

### Teaching out an accredited degree program

When an education provider decides to no longer offer an accredited program, the program enters a period of 'teach out'. Teach out continues until there are no longer any students enrolled in the program.

For the duration of teach out, the program must maintain accreditation (and approval from PharmBA) by continuing to meet the Accreditation Standards and submitting ongoing reporting for review by the AC. If the accreditation expiry date of a program in 'teach out' is approaching and there are still students completing the program, the education provider must submit an application for the program to be considered for reaccreditation. The usual accreditation process will apply.

If you would like to know more about teach out of an accredited program, please see our [Accredited Degree Program Teach-out Policy](#).

### Revoking accreditation

We require accredited programs to maintain levels of quality that meet our Accreditation Standards.

As such, we will seek cooperative solutions where it has been determined that an education provider:

- has failed to provide timely reports or comply with requests for information
- has not satisfactorily addressed conditions which have been placed on the program, or will not be able to address them in a 'reasonable' period of time
- fails to meet the requisite standards and there is no reasonable assurance that the school is taking, or has the capacity to take, necessary remedial action.

If the AC has concerns about the accredited program being able to meet the Accreditation Standards, it can make a recommendation to not accredit a program in accordance with our *Revocation of Accreditation Policy for pharmacy programs*. The AC will utilise a number of mechanisms to evaluate compliance with the Accreditation Standards by the accredited program. They may include (but are not limited to):

- reporting against conditions and MRs
- annual reporting
- supplementary audit.

The process is as follows:

- the AC will make a recommendation to our Board to not accredit the program
- the Board will make a decision about next steps.

If this situation occurs, and our Board is not satisfied as to the provider's commitment and capacity to remedy deficiencies within a reasonable period, they may decide to revoke or deny accreditation.

Following a revocation decision, the education provider is able to appeal the decision within 30 days as outlined in our process for internal review of accreditation decisions.

## Step 5: Monitoring and reporting

To maintain the ongoing accreditation of your program(s), there are a number of regular quality assurance and monitoring activities which are undertaken. These are outlined in our [Accreditation Quality Assurance and Monitoring Policy](#) and include:

Reporting in response to conditions and MRs

Some programs may be required to report against conditions and/or MRs that the AC has applied. The AON we issue to the education provider will outline the requirements for the reporting, including the due dates.

Annual reporting

To help us assess whether your program can remain accredited for the duration of the accreditation period that has been granted, you will need to submit annual reporting. The information we will request from you each year includes:

- student/intern numbers
- staff demographics
- any quality assurance activities you have completed
- any planned or previously unreported changes to your accredited program(s)
- any other information requested by the AC.

We will provide you with an Annual Report template for you to complete (usually in the final quarter of each year). The AC will review your report and may provide you with feedback on it. In some cases, the AC may need to impose further reporting requirements on your accreditation based on the report.

## Notification of change (NoC) to a pharmacy program

We strive to maintain an open and ongoing dialogue with all of our accredited program providers. This in turn allows us to communicate effectively and efficiently regarding any planned program changes.

You must notify us of any planned program changes **prior** to the change taking place via the [NoC form](#). If you would like any guidance on the NoC process and your potential program change, please [contact us](#) early in the planning process for guidance. Approval must be granted by the AC **prior** to the change(s) being implemented.

The AC will consider the impact of the planned changes on the ability of the program to meet the [Accreditation Standards](#), and will determine if the change is minor or material (major).

Some examples of minor/material changes include:

*Table 6 Definitions of minor / material changes*

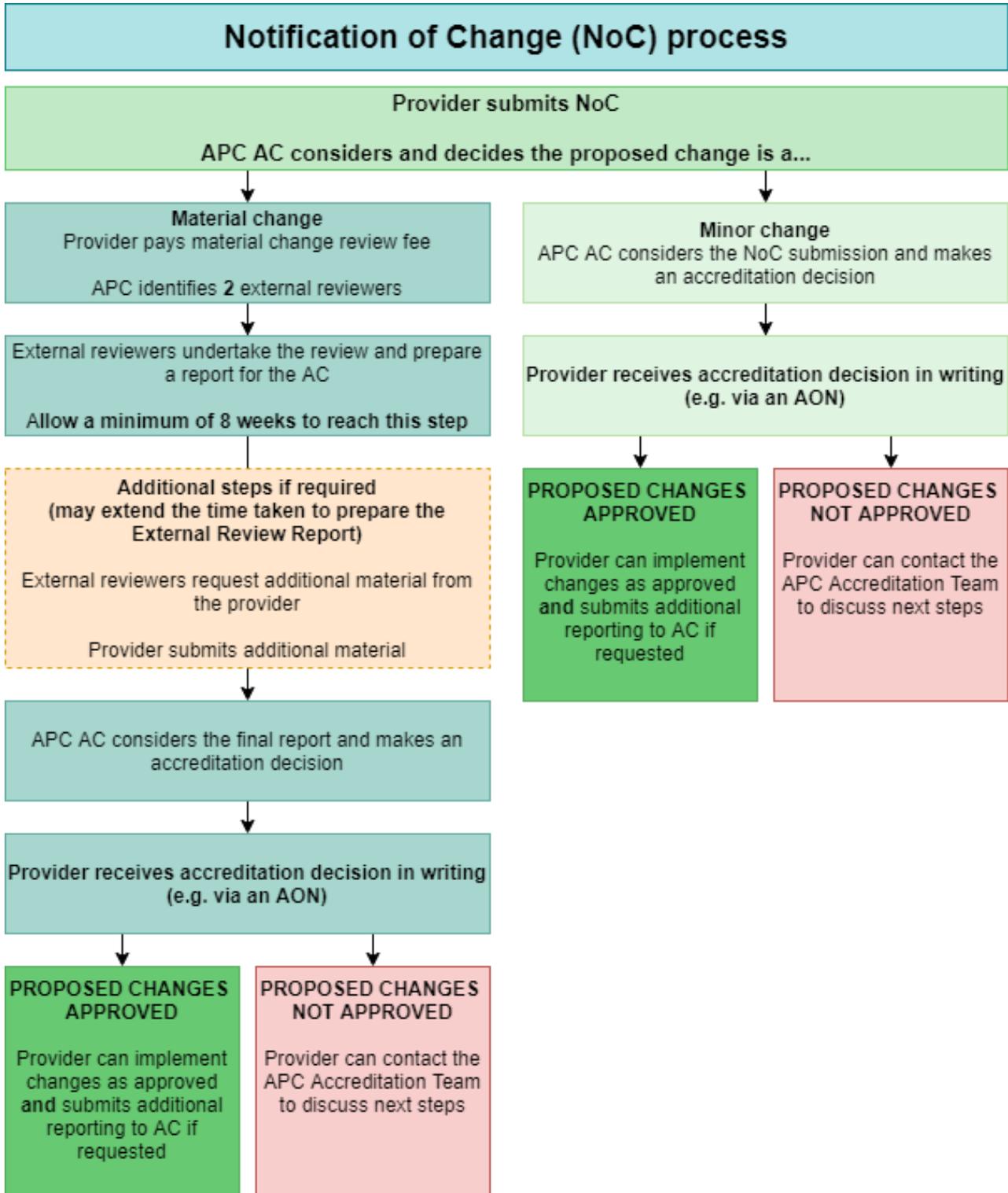
Minor change	Material (major) change
<ul style="list-style-type: none"> <li>change in designated leader e.g. program lead/Head of School</li> <li>changes in teaching staff</li> </ul>	<ul style="list-style-type: none"> <li>change in award title</li> <li>change in program length</li> <li>significant change in curriculum content and/or structure</li> <li>significant change in teaching methods and/or assessment</li> <li>significant change in the human and/or financial resources available for delivery of the program</li> <li>significant change in institutional settings and/or the establishment of an additional geographical location at which the program is offered</li> </ul>
<p><b>Please note this is not an extensive list, and the AC makes decisions on a case by case basis using all the information available to them.</b></p>	

If the change is deemed a 'material change' and warrants a re-assessment of the accreditation status of the program(s), this may be resolved by the undertaking of an external review and may include a site visit. Material changes will incur a [material change review fee](#).

The AC's decision will be issued to the education provider via an AON. If the proposed changes are approved, the AON will outline the approved commencement date and any additional conditions and/or MRs that have been applied.

Please see below for an overview of the NoC process:

Figure 2 APC Notification of Change (NoC) process



If an education provider chooses to promote/market their planned changes or their new program prior to approval by the AC, any marketing/promotional material for the new or changed program must include wording that makes it clear that the program is not yet APC accredited or PharmBA approved. Further detail is described in our [Accreditation Marketing Policy](#). Providers should familiarise themselves with the requirements of part 3.1.2 of the policy which describe the specific wording to be used in any marketing/promotional material. Failure to meet the requirements may result in the processing of the NoC/new program accreditation application being suspended until the matter is resolved.

The following process will occur if you are found to be in breach of the policy:

1. we will advise you via email of the issue and that you are required to remove or amend the promotional material to meet the requirements
2. we will suspend the processing of the NoC/accreditation application until the promotional material is amended.

## Step 6: Reaccreditation

Before your program(s) accreditation expiry date, we will contact you to ask you to apply for reaccreditation. We will explain the reaccreditation process, timeline, and submission requirements.

The reaccreditation process follows similar steps to the initial accreditation process.

*Table 7 Reaccreditation process*

Actions for Australian programs	Actions for international programs
<b>Up to 12 months before accreditation expires</b>	
We will:	
<ul style="list-style-type: none"> <li>• notify you that you need to begin the reaccreditation process</li> <li>• negotiate mutually suitable dates for the submission of your accreditation application and site visit               <ul style="list-style-type: none"> <li>• send you the accreditation application template and submission details</li> <li>• appoint a SET to undertake the accreditation review.</li> </ul> </li> </ul>	
<b>6 weeks before the site visit</b>	
You apply for reaccreditation.	
<b>0 - 6 weeks before the site visit</b>	
The SET and APC Auditor review your application and evidence.	
<b>2 - 6 months before accreditation expires</b>	
The SET undertakes a site visit.	
<b>Before accreditation expires</b>	

Actions for Australian programs	Actions for international programs
<p>The SET finalises their SET Report.</p> <p>The AC makes their accreditation decision.</p> <p>We will notify you of your accreditation outcome.</p>	<p>The SET finalises their SET Report.</p> <p>The AC makes their accreditation recommendation to our Board.</p> <p>The Board makes their accreditation decision.</p> <p>We will notify you of your accreditation outcome.</p>

## Additional information

### Accreditation fees

We charge accreditation fees to cover the costs of ongoing program accreditation. The fees we charge vary depending on the program type. There are also a number of different fees that can apply to different program types. They include:

- initial accreditation fee
- annual fee
- site evaluation charge
- NoC material change review fee.

Fees are available on our [website](#). They are reviewed annually and updated when required. Our Board approves any changes to accreditation fees, and we notify education providers via email prior to any changes being applied.

#### Initial accreditation fee

We will invoice you the [initial accreditation assessment fee](#) upon receiving your accreditation submission.

**Please note:** International program providers will also incur a variable 'site evaluation charge' for the program site visit. This is charged on a cost recovery basis and includes travel, accommodation, sitting fees and staff costs. We will invoice you this fee after the site visit.

#### Annual fees

We require all accredited programs to pay an [annual fee](#) to cover the costs of ongoing program accreditation.

#### Accredited degree programs

We invoice accredited degree programs in January each year for their annual accreditation fee [per program](#). There is a two-tier fee structure that recognises the reduced cost for us to accredit second (and subsequent) programs delivered by a single provider. The following definitions describe how we determine applicable fees:

##### First accredited program

The first pharmacy degree program offered by a university. It can be a BPharm, BPharm(Hons) or an MPharm.

### Additional accredited program

These are subsequent degree programs that you deliver in addition to your first accredited program. They lead to eligibility for provisional registration and may be at a bachelor or master's degree level. They can be:

- a different version of your first program (for example a double degree incorporating a BPharm)
- multicampus delivery of your first program
- a separate program (for example an MPharm in addition to a BPharm).

If you stop offering your first accredited program, one of your additional programs will become your first program when we calculate your fees.

The following table provides examples of program combinations within a single provider to explain the application of the degree program annual fees.

*Table 8 Determination of applicable degree program annual fees*

Program combinations delivered by a single provider	Applicable fees	Explanation
BPharm OR MPharm	First	
BPharm + BPharm(Hons)	First	Multiple programs of the same duration, a single fee is applied.
BPharm (campus A) + BPharm (campus B)	First + Additional	Multicampus delivery of your first program, 2 program fees apply.
BPharm + MPharm	First + Additional	Program type and duration is different, 2 program fees apply.
BPharm + BPharmMgmt	First + Additional	Program type and duration is different, 2 program fees apply.

### Accredited ITPs

In April each year we request that ITPs provide us with their intern numbers at the time of their census (usually 31 March). The ITP is then invoiced on a per capita basis.

We note there may be changes to intern numbers during the year (e.g. late enrolments or withdrawals). ITPs are asked to include any change in intern numbers made after census date in the intern numbers provided to us the following year.

#### Site evaluation charge

A site evaluation charge is applied to international programs or Australian programs undergoing a supplementary audit. We invoice education providers a [site evaluation charge](#) (on a cost recovery basis) after the site visit. The charge includes travel, accommodation, sitting fees and our staff costs.

#### Notification of Change (NoC) material change review fee

If you submit a NoC to us which our AC determines to be a material (major) change that requires an external review, we will invoice you the [NoC material change review fee](#).

## Complaints and appeals

### Appealing an accreditation decision

If you would like to appeal an accreditation decision made by our AC regarding your pharmacy program, our [Appeals Policy](#) outlines the process.

### Making a formal complaint about an accredited program or provider

If you would like to make a complaint about an accredited program or provider's compliance with the Accreditation Standards, our [Complaints Policy regarding APC Accredited Providers or Programs](#) outlines the process.

## Where to find more information

Whether you are completing your application for initial accreditation or reaccreditation of a pharmacy program, or wanting to know more about what you need to do to remain accredited, there are resources available on our website to help:

- [policies](#) including marketing, quality assurance and monitoring, complaints and conflict of interest
- [accreditation standards and guidelines](#)
- [templates](#) including international expression of interest and notification of change

If you would like a Word version of any of the accreditation templates, please contact our accreditation team at [accreditation@pharmacycouncil.org.au](mailto:accreditation@pharmacycouncil.org.au).

## Contact our accreditation team

If you have any questions, please contact our accreditation team at [accreditation@pharmacycouncil.org.au](mailto:accreditation@pharmacycouncil.org.au).

