

Summary Report of the Feedback Received from Accreditation Team Members and Higher Education Institutions on the Accreditation Process - 2020

Introduction

The Pharmaceutical Society of Ireland (PSI) is an independent statutory body, established by the Pharmacy Act 2007. It is charged with, and is accountable for, the effective regulation of pharmacists and pharmacies, including responsibility for supervising compliance with the Act. The PSI regulates the profession and pharmacy owners in the interest of patient safety and public protection.

Among its many functions, the PSI promotes and ensures high standards of education and training for pharmacists. One of the ways the PSI achieves this is by determining the standards for pharmacist education and approving and keeping under review national pharmacy degree programmes through an accreditation process.

In 2020, the PSI undertook three accreditation visits to three Schools of Pharmacy in the State. As part of its quality assurance practices, the PSI regularly monitors and reviews its accreditation policy and processes to help ensure that they remain fit for purpose. This monitoring and review process includes the surveying of accreditation team members and Schools of Pharmacy on various aspects of the accreditation process, including: roles and responsibilities; documentation; the visit; the evaluation report; and the accreditation process. Where appropriate, similar questions are included in both the accreditation team member survey and the School of Pharmacy survey to allow for a 360° review of the accreditation process. Where necessary, and where allowed by legislation, amendments to the accreditation policy and process are made in response to the feedback received.

The surveying of accreditation teams and Schools of Pharmacy also includes an accreditation team evaluation exercise that focuses on the performance of an accreditation team. This exercise was developed to help the PSI ensure that the accreditation teams that it establishes, have the appropriate knowledge, skill and competencies to undertake the role and to help identify any additional information or training that should be provided to accreditation teams.

This report provides a summary of the feedback received from accreditation team members and the Schools of Pharmacy in relation to the three accreditation visits that took place in 2020. 11 participants responded to the accreditation team members survey, representing a response rate of 68.75%. The three Schools of Pharmacy responded to the survey, representing a 100% response rate. The PSI is very grateful to all those who took the time to complete the surveys.

A summary of the feedback provided by accreditation team members is included in Section 1 of this report. Section 2 includes a summary of the feedback received from the Schools of Pharmacy. Lastly, Section 3 includes the PSIs response to the feedback received and the comments provided.

Disclaimer

This report is based on responses received from accreditation team members and Schools of Pharmacy. It should be noted that not all accreditation team members responded to the surveys, and, of those that did, not all responded to every question.

Section 1: Summary of the feedback received from accreditation team members

This section includes a summary of the feedback provided by accreditation team members. Accreditation team members were requested to provide feedback on the following aspects of the accreditation process:

- Roles and responsibilities
 - Documentation
 - Initial impressions and planning meeting
 - Visit arrangements
 - Visit
 - Evaluation report
 - Accreditation process
 - Accreditation team evaluation
- **Roles and Responsibilities**
When the PSI receives an application for accreditation or continued accreditation, it establishes an accreditation team. The accreditation team is independent and their role is to evaluate an application for accreditation or continued accreditation on behalf of the PSI and to make a recommendation to the PSI Council on whether or not it should accredit a programme. Representatives from the PSI attend the visits to the Schools of Pharmacy. However, they are not members of an accreditation team and attend only to provide clarification on areas of policy and legislation, if required.

In 2019, the PSI published an expression of interest for those persons interested in becoming a member of an accreditation team. The booklet included information on the role, the accreditation process and the workload involved. Similarly, on appointment to an accreditation team, team members were provided with further information relating to their roles, responsibilities and expected conduct. A training and briefing event for accreditation team members was also provided.

The feedback received in relation to roles and responsibilities is very positive and is welcomed by the PSI. For example, 100% of respondents indicated that the accreditation process was clearly defined and easy to follow and 100% also indicated that the PSI provided them with sufficient information in relation to their roles and responsibilities. The comments provided include: that the process was clear; that staff were helpful in ensuring clarity; and that the information was substantial. In addition, 100% also indicated that the briefing and training event that was provided was sufficient to allow them to undertake their roles and responsibilities.

- **Documentation**

To facilitate accreditation team members in their roles, they are provided with documentation from both the PSI and the applicant School of Pharmacy. The documentation provided by the PSI includes:

- the accreditation policy,
- the accreditation standards,
- the relevant legislation, and
- Roles, Responsibilities and Conduct of Accreditation Team Members.

Documentation provided by the institution includes a self-evaluation report and any additional supporting documentation provided by the institution. Accreditation team members might also request further information from the School of Pharmacy, if clarification is needed. This step is built into the accreditation process.

The feedback received in relation to the documentation was also very positive. 100% of respondents indicated that the documentation that was provided by both the PSI and the institution helped them to fulfil their role. Comments include: that the documentation was excellent, comprehensive and sufficient; of a high standard; and thorough.

The amount of documentation that accreditation team members are required to review is substantial. Therefore, it is important that the accreditation process allows enough time for accreditation team members to be able to review the documentation prior to the visit to the institution. This is important to help ensure that the judgments of accreditation team members are informed by the evidence presented and are within the remit of the accreditation process. 100% of respondents indicated that they had sufficient time to review the documentation prior to the visit to the institution.

- **Initial impressions and planning meeting**

As part of the accreditation process, accreditation team members are invited to submit their initial impressions of an application for accreditation or continued accreditation a few weeks prior to the visit to the institution. The purpose of the initial impressions is to highlight early in the process any areas requiring clarification and/or any additional documentation that the accreditation team members might require as part of an evaluation.

A planning meeting takes place usually the day before the visit to the institution. The purpose of the planning meeting is to allow the accreditation team to meet, to review initial impressions, to discuss further areas requiring clarification, and to discuss the visit to the institution.

The feedback received in relation to initial impressions and the planning meeting was positive. 100% indicated that they submitted initial impressions and that they were useful in preparing for the visit to the School of Pharmacy. Comments include: it was useful to read the different perspectives; they were useful for preparation for the visit; and they were helpful in identifying lines of enquiry.

In relation to the planning meeting, 90.91% indicated that they thought the planning meeting was useful in preparing for the visit to the institution. Comments include: it was useful; it was essential; and it was useful to meet other accreditation team members. 90.91% also indicated that enough time was allocated to the planning meeting.

- **Visit**

The purpose of a visit to a School is to allow members of the accreditation team and representatives of the School to meet and discuss an application for accreditation. It also provides accreditation team members with an opportunity to view the institutions facilities. The duration of a visit varies and depends on the nature of the accreditation. For example, a full accreditation visit usually takes place over two days while compliance visits take place over a shorter period of time. It is important that enough time is afforded to the visit as there is no further opportunity in the accreditation process for accreditation team members and representatives from an institution to meet. In this instance, the visit took place over two days. An agenda was drafted and agreed with the Chair of the accreditation team and the Head of School prior to the visit taking place.

Similar to the feedback received above, the feedback in relation to the visit was positive. 100% of respondents indicated that the agenda for the visit allowed sufficient time to meet with representatives from the institution and 81.82% of respondents indicated that the visit gave sufficient opportunity to discuss areas requiring clarification and to discuss/resolve any issues.

- **Evaluation report**

After a visit to a School of Pharmacy, an evaluation report is drafted by a rapporteur appointed by the PSI. The evaluation report is an evidence-based report which includes evidence to justify the overall recommendation of an accreditation team on whether or not the PSI Council should accredit a programme. A template is provided which requires an accreditation team to include evidence for its judgement on whether each of the accreditation standards have been met. Once the evaluation report has been agreed by the accreditation team members and the Chairperson, it is then forwarded to the School of Pharmacy for comment and for a factual accuracy check. Schools of Pharmacy have one month to comment and submit any comments and factual inaccuracies. These, in turn, are addressed by the Chairperson, where necessary. If warranted, members of the accreditation team might also be consulted.

100% of respondents indicated that the accreditation team was sufficiently well informed in order to produce the evaluation report. In addition, 100% of respondents indicated that they had sufficient time to agree the evaluation report and that the evaluation report template is fit-for-purpose.

- **Accreditation process**

Feedback on the accreditation process, its outcome, and its fairness and transparency was very positive. 100% of respondents indicated they are confident in the outcome of the accreditation process and similarly, 100% of respondents also indicated that the process was fair and transparent.

- **Accreditation team evaluation**

As mentioned previously, in 2020, the PSI introduced a team evaluation exercise as part of its accreditation monitoring and review process. Its focus is on the performance of the accreditation team and its purpose is to help the PSI identify any additional information and training that should be provided to accreditation team members to help ensure the effectiveness of the accreditation process. Accreditation team members are asked questions in relation to team performance, roles and responsibilities, and experience, expertise and skills.

The feedback received in relation to the accreditation team evaluation is very positive. 100% of respondents indicated that the accreditation team worked well together as a team and that they thought that all team members understood their roles and responsibilities.

In relation to experience, expertise and skills, 100% of respondents indicated that the accreditation team collectively had the appropriate experience, expertise and skills to undertake their role and responsibilities and 90.91% of respondents indicated that there was no other areas of experience, expertise and skills that an accreditation team and the accreditation process would benefit from. The comments provided referred to the breadth of knowledge and experience of the team members, the mix of practitioners, both academic and professional and the importance of that mix.

100% of respondents indicated that the accreditation team was sufficiently well prepared to undertake their roles and responsibilities and that the accreditation team conducted its business in a professional and respectful manner.

Only 10% of respondents indicated areas of improvement in relation to their own experience, expertise and skills that would be useful to develop further.

Section 2: Summary of the feedback received from Schools of Pharmacy

This section includes a summary of the feedback provided by the three Schools of Pharmacy. The Schools of Pharmacy were requested to provide feedback on the following aspects of the accreditation process:

- Documentation
 - Visit
 - Evaluation report
 - Accreditation process
 - Accreditation team evaluation
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- **Documentation**

The PSI developed various resources to assist the Schools of Pharmacy when they are preparing an application for accreditation or continued accreditation. These documents include: the self-assessment template; guidance document; the accreditation standards; the Core Competency Framework for Pharmacists (CCF) and the accreditation policy.

The feedback in relation to the documentation provided by the PSI is positive. 100% of respondents indicated that the documentation provided by the PSI is sufficient to help prepare the self -assessment report and to prepare for the accreditation process.

As mentioned previously, accreditation team members might request additional documentation from an institution prior to the visit to an institution in instances where further information and clarification is needed. 100% of respondents indicated that they had sufficient time to gather additional documentation following a request from the accreditation team. This finding is welcomed by the PSI as previously institutions had advised that they had insufficient time to gather the additional documentation that is sometimes requested. Consequently, the PSI altered the accreditation process so that any significant additional documentation requests would be identified, insofar as possible, a number of weeks prior to the visit to the institution. Therefore, allowing institutions enough time to gather the additional requested documentation.
 - **Visit**

The feedback from the Schools of Pharmacy in relation to the visit to the institution was also very positive. For example, 100% of respondents indicated that they agreed the visit agenda with the PSI in advance of the visit. The comments provided stated that it was beneficial to agree the agenda in advance of the visit and that structuring that agenda around the accreditation standards was beneficial.

100% of respondents also indicated that the visit agenda allowed sufficient opportunity to meet with members of the accreditation team and that the agenda for the visit allowed sufficient opportunity to discuss areas requiring clarification from members of the accreditation team.

- **Evaluation report**

As mentioned previously, the evaluation report is an evidence-based report that provides evidence for the recommendation of an accreditation team to the PSI Council on whether or not it should accredit a programme. The evaluation report also includes any recommended commendations, recommendations and conditions specified by the accreditation team. It is important that the evidence for these, and the overall recommendation is clear so that institutions can respond to these, as appropriate.

Again, the feedback in relation to the evaluation report is positive. 100% of respondents indicated that the evaluation report is fit for purpose and that the evaluation report clearly set out the reasons and rationale for the recommendation of the accreditation team, including the reasons and rationale from any recommended commendations, recommendations and conditions. In addition, 100% of respondents indicated that they had sufficient time to prepare their response to the evaluation report. As mentioned previously, institutions have one month to submit any comments and factual inaccuracies that they may have in relation to the evaluation report.

- **Accreditation process**

100% of respondents indicated that they were confident in the outcome of the accreditation process. Similarly, 100% of respondents indicated that they thought that the accreditation process was fair and transparent.

- **Accreditation team evaluation**

The feedback received in relation to the accreditation team was very positive. 100% of respondents indicated that they thought that the accreditation team was sufficiently well prepared to undertake their role and responsibilities and 100% of respondents indicated that the accreditation team conducted its business in a professional and respectful manner. The comments provided referred to the professionalism and integrity of the accreditation team.

66.67% of respondents indicated that they thought that collectively, the accreditation team had the appropriate experience, expertise and skills to undertake their role and responsibilities.

Section 3: Areas highlighted for improvements and response from PSI

Overall, the feedback received from both the accreditation team members and the Schools of Pharmacy is very positive and is welcomed by the PSI. Most notably, 100% of accreditation team members and the Schools of Pharmacy indicated that they were confident in the outcome of the process and that the process was fair and transparent. This feedback provides assurance as to the effectiveness of the accreditation process and the transparency by which accreditation team members made their recommendations to the PSI Council on the accreditation of a programme. The transparent nature by which these recommendations are made was reflected in the feedback from the Schools of Pharmacy in relation to the evaluation report and the visit to the School. As reported above, 100% of the Schools of Pharmacy indicated that the evaluation report clearly set out the reasons and rationale for the recommendation of the accreditation team and that the visit agenda allowed sufficient opportunity to discuss areas requiring clarification from members of the accreditation team.

Other notable feedback relates to that received regarding the accreditation team evaluation. As noted above, the accreditation team evaluation was introduced for the first time in 2020 and the PSI welcomes the positive feedback it has received. For example, 100% of both accreditation team members and Schools of Pharmacy indicated that the accreditation team worked well together as a team and that they thought that all team members understood their roles and responsibilities. As mentioned earlier, as representatives from the PSI attend the visit for reasons of providing clarification on areas such as legislation and policy etc. only, it is important that accreditation teams are adequately informed and trained in relation to their role and responsibilities as it is they who make a recommendation to the PSI Council on an application for accreditation. The feedback suggests that the PSI can also be confident in the outcome of the accreditation process.

The PSI also welcomes the feedback from the Schools of Pharmacy in relation to the conduct of the accreditation team. For example, 100% of the Schools of Pharmacy indicated that the accreditation team conducted its business in a professional and respectful manner. In 2019, the PSI developed the document *Roles, Responsibilities, and Conduct of Accreditation Team Members* which is forwarded to all accreditation team members on appointment to an accreditation team. The feedback received suggests that that this document is fit-for-purpose and utilised and adhered to by accreditation team members.

Despite the predominately positive feedback, areas for improvement were also highlighted. These are also welcomed by the PSI as we strive for continued improvement in relation to our policies and processes. These, and a response to same are reported on below.

Areas highlighted for improvement by accreditation team members include the following:

1. Initial impressions.

- (a) A number of suggested improvements were highlighted in relation to the initial impression aspect of the accreditation process. Firstly, one respondent referred to the variation in the way that the initial impressions were presented by members of the accreditation team and described this as unhelpful.

- **PSI response**

The PSI developed a template that it requests accreditation team members to use when submitting their initial impressions. Instructions are included. However, despite this, the template and/or the included instructions were not followed on all occasions. To help avoid confusion, for future accreditation visits, accreditation teams will be advised of the importance of a consistent approach when using the template and following the accompanying instructions.

- (b) Secondly, accreditation team members are requested, as part of their initial impressions, to include the evidence for why they deem a standard to be met, as well as areas requiring further clarification. It was suggested in the feedback that only areas requiring clarification should be requested.

- **PSI response**

Accreditation team members are requested to include the evidence for why a standard is deemed to be met, or not met. This allows all members of an accreditation team to see the rationale and justification for a judgment of another member of the team, which may differ to their own. In addition, including the evidence for why a standard may be deemed to have been met also aids the rapporteur in the efficient drafting of the evaluation report, providing transparency for the institution concerned on the judgements made.

- (c) Finally, it was suggested that although accreditation team members are required to review all the documentation submitted as part of an application for accreditation or continued accreditation, that individual team members might lead on different accreditation standards.

- **PSI response**

As mentioned previously, the PSI acknowledges that accreditation team members take on a large workload when taking part in accreditation processes. The amount of documentation that must be reviewed is significant and the PSI is very grateful for their involvement. Accreditation teams are established to ensure that members have a wide range of the appropriate experience, knowledge, skill and expertise that is required. Therefore, it is reasonable to suggest that individual team members might lead on the accreditation standards that are most reflective of their knowledge and expertise etc. However,

accreditation teams work as a team and a consensus must be achieved prior to making a recommendation to the PSI Council. Consequently, it is a requirement that each accreditation team member consider and make a judgement on each of the accreditation standards.

2. Visit

Some suggested improvements made by accreditation team members in relation to the visit to the Schools of Pharmacy include limiting the number of representatives from the institution for each meeting to six to enable all to contribute fully. It was also suggested that the agenda for the visit could focus on teams from the institutions rather than the accreditation standards.

- **PSI response**

Prior to agreeing the visit agenda, the PSI consults with the Chair of the accreditation team and the Head of School. The Head of School is asked to indicate who from the institution will meet with the accreditation team for each individual meeting. As the meetings during the visit correspond to the accreditation standards, the Head of School is best placed to indicate the most appropriate representatives for each meeting who will be able to provide any clarification that may be needed. Currently, there is no limit on the number of representatives that can attend each meeting and the PSI wants to support institutions in demonstrating their ability to meet the Standards and therefore, do not wish to restrict the inclusion of any relevant member of the team.

In 2020, the PSI changed the visit agenda so that the meetings would focus on the accreditation standards rather than focused areas. The feedback that the visit could focus on teams from the institution is noted and the PSI will discuss this further with the Schools of Pharmacy.

3. Evaluation Report

Some of the comments provided by accreditation team members in relation to the evaluation report refer to the length of the report and the repetition in the report that is sometimes required.

- **PSI response**

In 2020, the PSI changed the evaluation report reporting requirements and reduced the length of the reports quite significantly. However, the PSI acknowledges that they are still long and will consider how they can be reduced further still, while at the same time including enough evidence to justify the recommendation of an accreditation team.

In relation to the repetition that is sometimes included in the evaluation reports, the PSI will advise the rapporteur and accreditation team members that repetition is not required and that the reader can be directed to the relevant information and evidence that may be included elsewhere in the report.

Areas highlighted for improvement by the Schools of Pharmacy include the following:

1. Documentation

The feedback received from the Schools of Pharmacy in relation to the documentation provided by the PSI is positive. However, some of the comments provided refer to the self-assessment report. Specifically, to the repetition in the self-assessment report and the need for more explicit guidance or narrative on what is required in the self-assessment report. Removing requirements for the duplication of information within the self-assessment report was also an improvement that was highlighted.

- **PSI response**

The self-assessment template that is provided requires the Schools of Pharmacy to include information on how it meets each of the accreditation standards. On occasion, due to the design of the template and to some overlap in the accreditation standards, institutions might repeat information in the self-assessment template when demonstrating how it meets a particular standard. The PSI will include an instruction in the template advising institutions that the repetition of information is not necessary and that the reader can be directed to information if included elsewhere in the self-assessment report.

In relation to the suggestion that more explicit guidance or a narrative is provided by the PSI in relation to the requirements of the self-assessment template, the PSI is currently drafting a guidance document in consultation with the Schools of Pharmacy in relation to revised accreditation standards.

2. Visit

Some suggested changes were provided as to how the visit to the institution could be improved upon. These included that the visit should focus on the standards. It was also suggested that discussions with students should be open and that the institutions staff should be able to comment on requests submitted by students to the committee.

- **PSI response**

The accreditation process, including the evaluation by the accreditation team and the visit to the School of Pharmacy, focuses on the accreditation standards. The recommendation of an accreditation team to the PSI Council on whether or

not it should accredit a programme is based on an accreditation teams evaluation on whether or not an application meets the accreditation standards. The feedback may suggest that an accreditation team requested information beyond that required to demonstrate a Standard was met. The PSI has amended policy and training of accreditation teams to ensure that team members are aware of the scope for questioning. In addition, the PSI Accreditation Policy includes a complaints procedure for institutions to utilize, where required.

During the visit to an institution, accreditation teams have an opportunity to meet with students enrolled on all years of the programme being accredited. This allows accreditation teams to gather the views of students on all aspects of the programme in line with the accreditation standards and for a triangulation of the evidence presented. Representatives from the School of Pharmacy do not attend these sessions. This allows for open dialogue between the students and the accreditation team. It is important that students feel that they can speak freely. Therefore, the PSI will not alter the visit agenda to allow representatives from the institution to attend the meeting with students.

In relation to institutions being provided with an opportunity to comment on requests that might be provided by students to accreditation teams, the PSI acknowledges that at times, student requests might be outside the control or capability of a School of Pharmacy for various reasons. The accreditation process facilitates institutions to provide comments on the evaluation report. Similarly, the visit agenda provides opportunity for accreditation teams to seek clarification on any matter from the Schools representatives, if needed.

3. Evaluation report

A suggested improvement that was provided in relation to the evaluation report was that draft evaluation reports should be proofread prior to being forwarded to the institution.

- **PSI response**

The PSI acknowledges that draft reports circulated as part of the process contained typographical errors. The PSI will ensure that future evaluation reports will be proofed prior to circulation and publication.

4. Accreditation team

Suggested improvements that were provided in relation to the accreditation team include reference to the lack of gender balance on accreditation teams and that specific expertise in certain disciplines are not represented on accreditation teams.

- **PSI response**

The PSI acknowledges that there is not always an appropriate gender balance on the accreditation teams it establishes. This can occur for various reasons but mainly due to the availability of suitable persons with the appropriate expertise. However, the PSI will endeavor to ensure an appropriate gender balance on future accreditation teams and will update its accreditation policy in line with public sector guidelines. In addition, since the accreditation visits the PSI have implemented its own Equality and Diversity policy.

In relation to specific expertise not being represented on accreditation teams the PSI acknowledges the feedback received in this regard. In 2020, the PSI published an expression of interest for those persons who might be interested in being a member of an accreditation team. The information provided included the type of competencies that applicants should have when applying. The PSI endeavors to ensure a balance of expertise across each accreditation team and in accordance with the PSI Accreditation Policy.