

ePortfolio Review: Policy on Extenuating Circumstances

Extenuating Circumstances Policy

The PSI Continuing Professional Development Rules 2015 (S.I. No. 553 of 2015) which came into effect on 1 January 2016, state that registered pharmacists have an obligation to undertake regular continuing professional development (CPD) in order to maintain their competence. The Rules require pharmacists to record and maintain a record of CPD activities, using an ePortfolio system, as specified by the PSI. Each registered pharmacist is obliged to submit a report of his or her CPD activities for review once in every 5 years.

To facilitate the ePortfolio review, the PSI will make a random selection from the register of pharmacists each year, and these pharmacists will be required to submit an extract of his/her ePortfolio to the Irish Institute of Pharmacy (IIP) for review. The PSI will notify the selected pharmacists by email, advising them of the next steps in the process.

On occasion, circumstances may arise where a selected pharmacist is not in a position to participate in the review. This document clarifies how a pharmacist can make an application for exemption from the review process and how the PSI will consider such applications.

An extenuating circumstance is regarded as a circumstance beyond the control of the individual, which has had and/or will have an impact on the pharmacist's ability to submit a report of his or her CPD activities for review and/or the ability to comply with CPD requirements.

Important Note: Extenuating circumstances involve, by definition, exceptional situations. The general assumption of PSI, as regulator, is that all pharmacists who are in practice will be in a position to submit for ePortfolio review when selected. Active and ongoing participation in CPD is expected as the norm of all practicing pharmacists and must not be seen as an additional or optional obligation. Hence, applications under this policy should only be made where genuine and substantial reasons exist and where the circumstances are supported by appropriate evidence.

Examples of Extenuating Circumstances

Because of their exceptional nature, it is not possible to provide an exhaustive list of scenarios that would fall into the category of extenuating circumstances. Applications will be dealt with on a case-by-case basis and on their own merits. However, for the purpose of illustration, the following is a list of circumstances where the granting of extenuating circumstances could apply and examples of the evidence required to support such an application.

Circumstance	Supporting documentation to be submitted with application
Serious illness preventing a pharmacist from being able to work.	An original medical certificate or letter from an appropriate medical professional confirming the nature and duration of the illness that prevents the pharmacist from working.

Acute personal/emotional circumstances which prevent a pharmacist from working.	An original medical certificate or letter from an appropriate medical professional confirming the nature of the circumstances.
Serious illness of a close family member (e.g. spouse, parent, child) that directly impacts the pharmacist	A medical cert/letter from an appropriate medical professional confirming the nature of the circumstances and explanation of direct impact.
Long-duration jury duty	A letter indicating jury service
Maternity leave only on the following occasions: a) where the pharmacist is on maternity leave at the time of submission of ePortfolio; b) if the pharmacist has worked less than 6 months in the year they are selected for ePortfolio Review and/or Parental leave (when taken as 'block' period of time).	Letter from appropriate medical professional and employer confirming the duration of the maternity leave.

Examples of generally unacceptable circumstances are set out below.

Generally unacceptable circumstances	Examples
A short-term illness	Short illness that has occurred during the year
Personal disruptions or events	Holidays, staying, travelling or living abroad, weddings, changing address or employment
Excessive demands on time or pressure of one's employment	
Financial problems	
Unemployment	
Career break	This includes registered pharmacists who may be practising in another profession and do not practice pharmacy. All pharmacists on the Register are obliged to engage in CPD.
Retirement	Retired pharmacists who wish to remain on the Register are obliged to engage in CPD.

Process

On receipt of notification that a pharmacist has been selected to submit for ePortfolio review, if he/she feels they are unable to submit a report of CPD activities for review due to extenuating circumstances (bearing in mind the Important Note, above), he/she should complete the Extenuating Circumstances Form and submit all supporting documentation for submission to the PSI by the deadline outlined on the notification email. **The pharmacist must submit a full and complete application providing a detailed explanation on the form as**

to why they are seeking an exemption.

- The PSI will acknowledge receipt of the application in writing within 7 working days from the date the application is submitted. The PSI will also outline the timelines for when a pharmacist can expect to receive an outcome on their extenuating circumstances application.
- The application will be considered by the PSI and the outcome will be issued to the applicant formally in writing.

If the pharmacist is unable to complete the application form due to being incapacitated, a next of kin may contact the PSI and request to complete and submit the application on their behalf.

Outcomes

There are two possible outcomes following an application for exemption from the ePortfolio review process, due to extenuating circumstances:

- The application is approved, and the pharmacist is exempt from submitting a report of his or her CPD activities for the review year. In these circumstances, the pharmacist will be required to submit the report the following review year.
- The application is not approved, and the pharmacist must submit a report of his or her CPD activities for the current review year.

It is important to note that applicants should not assume that an application has been granted until they receive written confirmation from the PSI.

Appeals Process

If a registrant wishes to appeal a decision, where an extenuating circumstances application has not been approved, they must submit a supporting statement in writing within 14 days of receiving notification that their application has not been approved, setting out the grounds for their appeal. This statement, together with the extenuating circumstances application will then be considered by the Registrar.

There are two possible outcomes following an appeal request:

- The application is approved, and the pharmacist is exempt from submitting a report of his or her CPD activities for the review year. In these circumstances, the pharmacist will be required to submit the report the following review year. However, if for very exceptional reasons, a pharmacist cannot participate in the next scheduled ePortfolio Review, they must submit another application form for extenuating circumstances.
- The application is not approved, and the pharmacist must submit a report of his or her CPD activities for the current review year.

Supporting Documentation

- It is the responsibility of the applicant to provide relevant supporting documentation. Applications made to the PSI without independent supporting documentation will not be considered.
- The PSI reserves the right to independently verify any supporting documentation if deemed necessary. If any supporting documentation cannot be independently verified, the PSI reserves the right to reject an application.
- Supporting documentation provided by a third party must be provided by a relevant, qualified, independent professional, who must not be a relative of the applicant.
- Only original supporting documentation and/or copies of original documents will be accepted.
- Any supporting documentation submitted that is not in the English/Irish language must also be accompanied by a certified translation. The translation must be carried out by a registered and authorised translator. On the page of the translation, the translator must state name of translator and business address, certify that they are authorised to translate from the language into English [or Irish] language(s) and certify that the translation is true and accurate.
- Documentation submitted in support of an application must be unaltered. Altered or amended documentation will not be accepted.
- If evidence of fraudulent documentation is found during assessment of an application, the matter will be referred to the Registrar of the PSI.
- The data and information provided as part of the application is treated in the strictest confidence in accordance with the PSI's Data Protection policies.
- All applications are retained in accordance with the PSI's [retention policy](#).

Assessment of Extenuating Circumstances Applications

Applications for extenuating circumstances will be considered on a case-by-case basis.

When assessing applications for extenuating circumstances, the following considerations shall be included in the assessment process:

- What potential patient safety implications arise, if the pharmacist is exempted from ePortfolio review on this occasion?
- Has the application been submitted by the deadline and in the appropriate form with all relevant supporting documentation?
- Has the pharmacist previously submitted an application for extenuating circumstances?
- Is the pharmacist currently practising?
- Are the reasons genuine and substantial?