Consultation on the review of the CPD Model for Pharmacists

2021

May 2021

Introduction

The Pharmaceutical Society of Ireland (PSI) is a public body established in law to protect the health, safety and wellbeing of patients and the public by regulating pharmacists in pharmacies in Ireland.

Our principal function is to ensure patient safety and public protection. We are committed to carrying out our work independently, ethically, and transparently. The Pharmacy Act 2007, established the statutory role and responsibilities of the PSI as the pharmacy regulator, which include:

- Registration of pharmacists, pharmaceutical assistants and pharmacies.
- Setting standards for pharmacy education and training:
- Ensuring all registered pharmacists are undertaking appropriate continuing professional development (CPD).
- Promoting good professional practice by pharmacists, by raising standards and sharing information for the benefit of patients and the wider health system.
- Assessing compliance and taking actions to address poor performance, practices and behaviours through our inspection and enforcement functions, by considering formal complaints made against a pharmacist or a pharmacy and through the imposition of sanctions.
- Providing advice, support and guidance to the public, pharmacy profession and Government on pharmacy care, treatment, and services in Ireland.

Continuous Professional Development (CPD)

In 2009, following a detailed review and assessment of international CPD models, the PSI established a portfolio-based, self-reflective, outputs focused CPD model for pharmacists. This model allows pharmacists to employ a wide range of learning methods to meet their individual learning needs. In accordance with the legislation underpinning the CPD model, pharmacists are obliged to maintain an online record of their CPD (ePortfolio) and demonstrate evidence of this to the IIOP, on request, once in every five years. In addition, patient facing pharmacists may be required to present for Practice Review. Information on the CPD system is available on our website. The CPD system is underpinned by the Pharmaceutical Society of Ireland (CPD Rules) 2015.

As the first five-year cycle of the CPD system for pharmacists is now complete, and in keeping with our EFQM commitment to on-going development and improvement, the PSI has commenced a review of the CPD model. As part of this review, the PSI sought feedback, from pharmacists registered with the PSI through a survey, during the period 1 April to 23 April 2021. Pharmacists were also provided with an option to provide feedback via email.

The survey invited feedback from pharmacists on the current CPD model and it included questions on pharmacists' experience of the CPD model, including the ePortfolio Review and Practice Review processes. Feedback on how the PSI can best assure that pharmacists

undertake appropriate CPD was also sought. The findings of the survey are reported below. These findings will inform the next steps of the review of the CPD model.

Results

Response Rate

At the time of the survey, there were 6750 pharmacists registered with the PSI. Of these, 611 completed the survey. 85 responses were not accepted as the responses were deemed unusable as survey respondents failed to answer beyond Questions 1-3. A further 5 responses were deleted as the relevant data protection requirements were not agreed. Therefore, 521 responses were reviewed representing a response rate of 7.7%.

Question 1: Data Protection and Freedom of Information Question

100% of respondents confirmed that they consent to providing their answers to the questions in the survey.

Question 2: Please identify your area of practice:

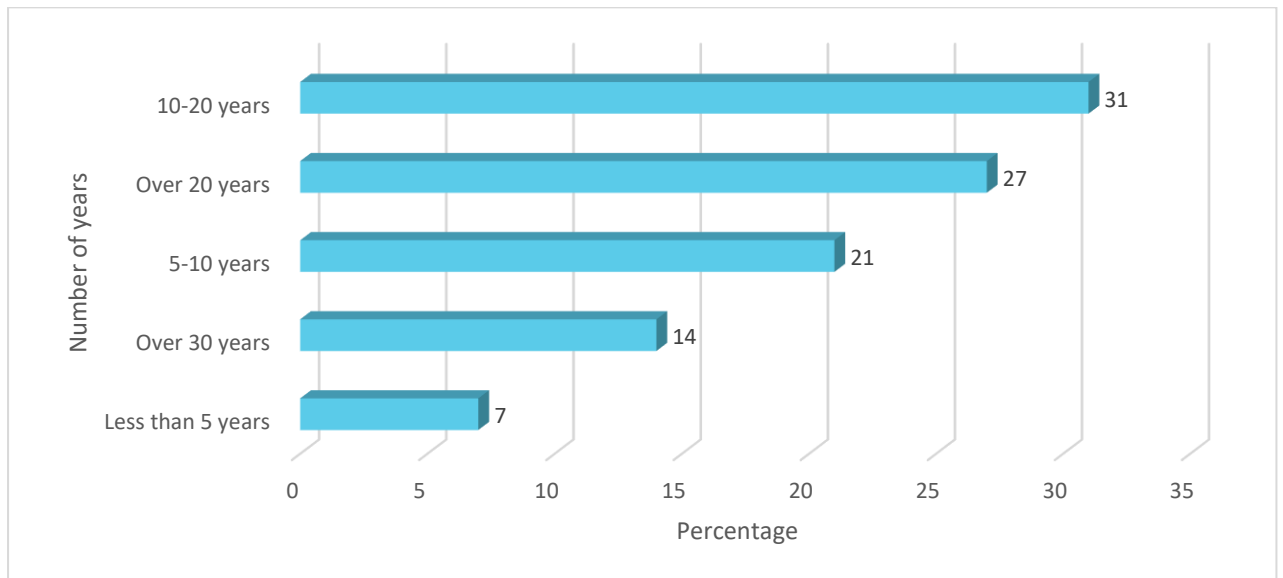| Answered	517
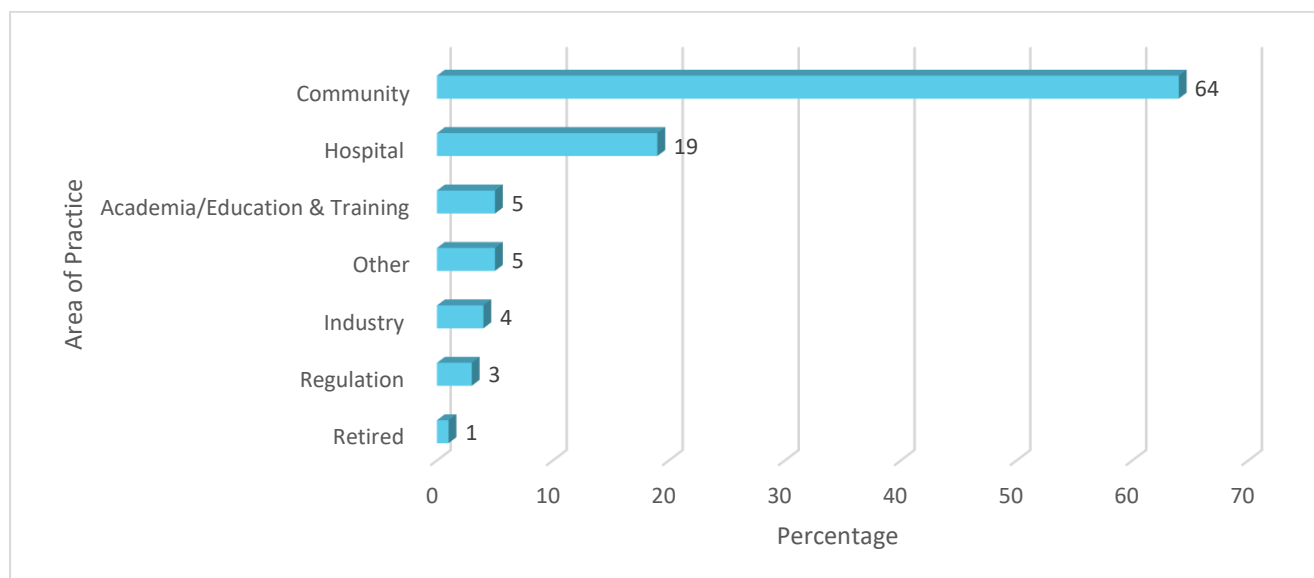
5% of respondents indicated "other" as their area of practice.

Examples cited included: the HSE, medicines information, quality & patient safety, health policy, consultancy, health insurance, pricing & reimbursement, and information technology.

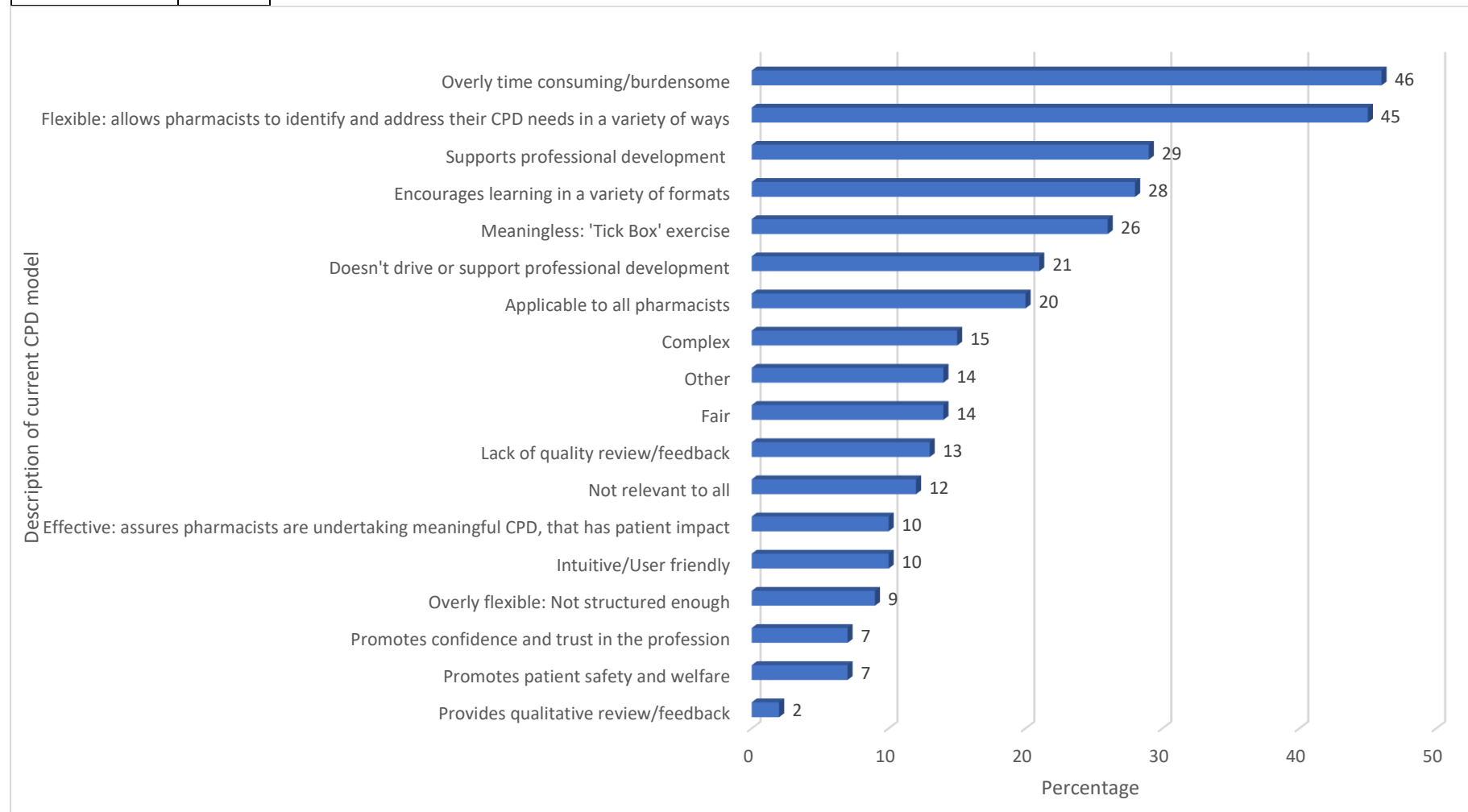Question 3: How many years have you been practicing as a pharmacist?

Answered	519

Bar chart showing Percentage by Number of years:
- 10-20 years: 31
- Over 20 years: 27
- 5-10 years: 21
- Over 30 years: 14
- Less than 5 years: 7

Question 4: What 3 phrases would you use to describe the current CPD system?

Answered	516

Horizontal bar chart — Y-axis: "Description of current CPD model", X-axis: "Percentage"

- Overly time consuming/burdensome — 46
- Flexible: allows pharmacists to identify and address their CPD needs in a variety of ways — 45
- Supports professional development — 29
- Encourages learning in a variety of formats — 28
- Meaningless: 'Tick Box' exercise — 26
- Doesn't drive or support professional development — 21
- Applicable to all pharmacists — 20
- Complex — 15
- Other — 14
- Fair — 14
- Lack of quality review/feedback — 13
- Not relevant to all — 12
- Effective: assures pharmacists are undertaking meaningful CPD, that has patient impact — 10
- Intuitive/User friendly — 10
- Overly flexible: Not structured enough — 9
- Promotes confidence and trust in the profession — 7
- Promotes patient safety and welfare — 7
- Provides qualitative review/feedback — 2

The most common phrases used by respondents to describe the current CPD system are:
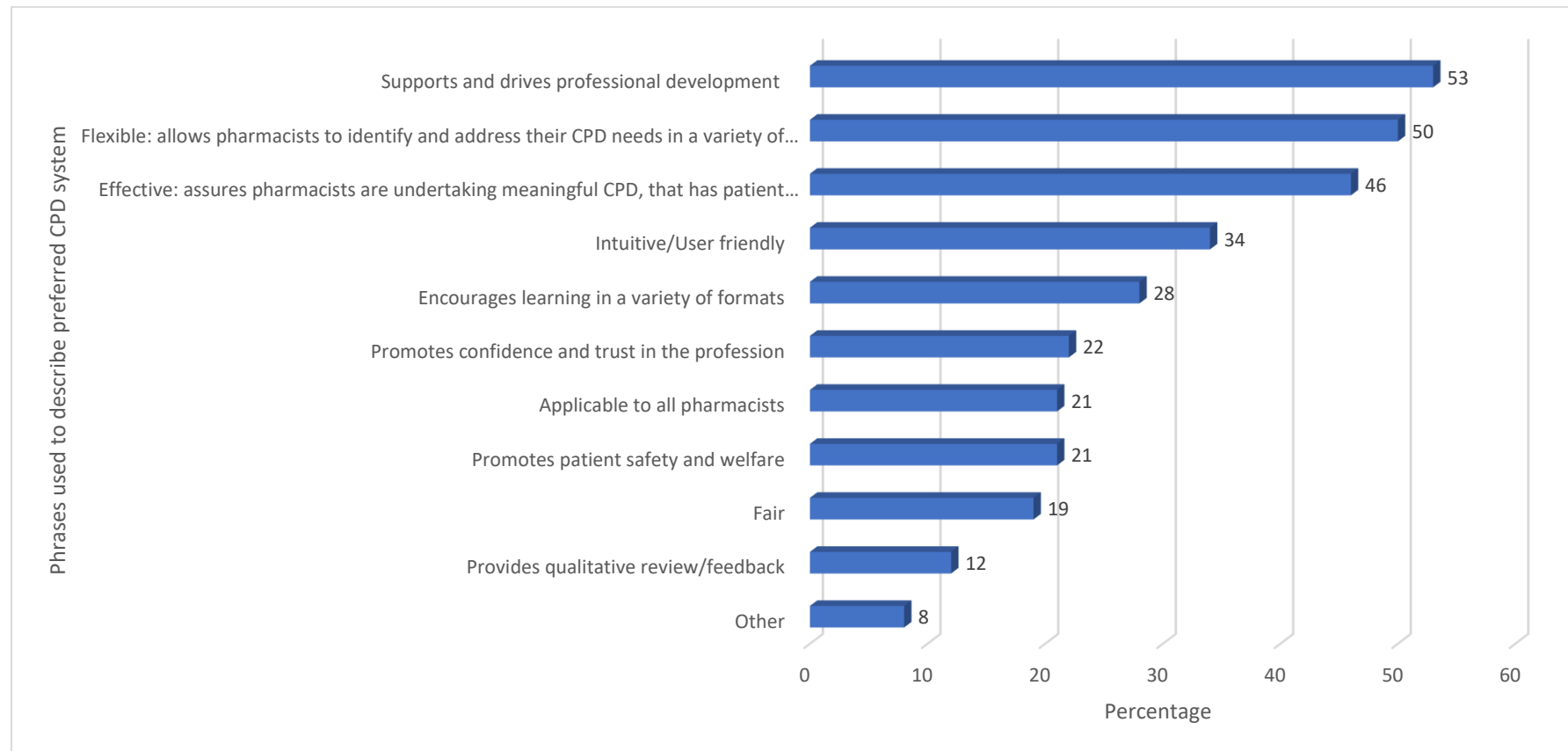
- overly time consuming/burdensome (46%),
- flexible: allows pharmacists to identify and address their CPD needs in a variety of ways (45%),
- it supports professional development (29%).
- it encourages learning in a variety of formats (28%)
- it is meaningless:'Tick-Box' exercise (26%)

14% of respondents indicated 'other'. A comment box was provided. A list of the responses (73) is available at Appendix 1. The most common themes identified under this question are:

Theme	Number of responses
Time consuming/burdensome/demanding	21
Criticism of Practice Review	13
Community pharmacy practice focussed	10
Preference for points based/credit-based model	9
Criticism of Core Competency Self-Assessment Tool (CCSAT)	8
Tick box exercise/meaningless	7

Question 5: What 3 phrases would you like to see describe the CPD system for pharmacists?

Answered	515

Horizontal bar chart. Y-axis: "Phrases used to describe preferred CPD system". X-axis: "Percentage".

- Supports and drives professional development: 53
- Flexible: allows pharmacists to identify and address their CPD needs in a variety of…: 50
- Effective: assures pharmacists are undertaking meaningful CPD, that has patient…: 46
- Intuitive/User friendly: 34
- Encourages learning in a variety of formats: 28
- Promotes confidence and trust in the profession: 22
- Applicable to all pharmacists: 21
- Promotes patient safety and welfare: 21
- Fair: 19
- Provides qualitative review/feedback: 12
- Other: 8

The most common phrases which respondents would like to see used to describe the current CPD system are:

- supports and drives professional development (53%).
- flexible: allows pharmacists to identify and address their CPD needs in a variety of ways (50%)
- effective: assures pharmacists are undertaking meaningful CPD, that has patient impact (46%)
- intuitive/user friendly (34%),
- encourages learning in a variety of different formats (28%)

8% of respondents indicated 'other'. A comment box was provided. A list of the responses (39) is available at Appendix 2. The most common themes identified under this question are:

Theme	Number of responses
Recognise formal/structured learning/ favour points/credit-based model	11
Overly time consuming	5
Overly complicated /repetitive	4
Community pharmacy practice focussed.	2
Tick box exercise	2

Question 6: Is the current CPD system supporting practitioner development?
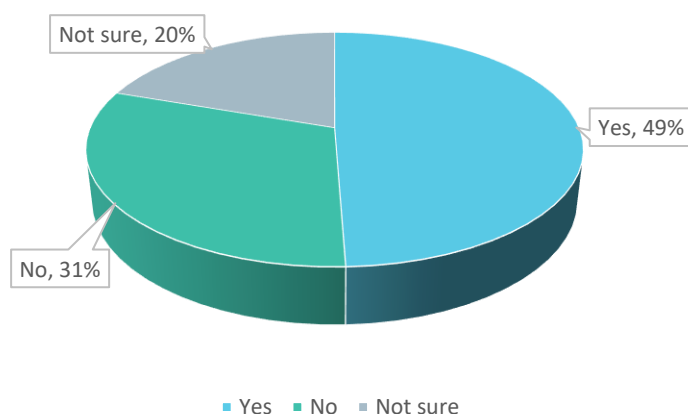
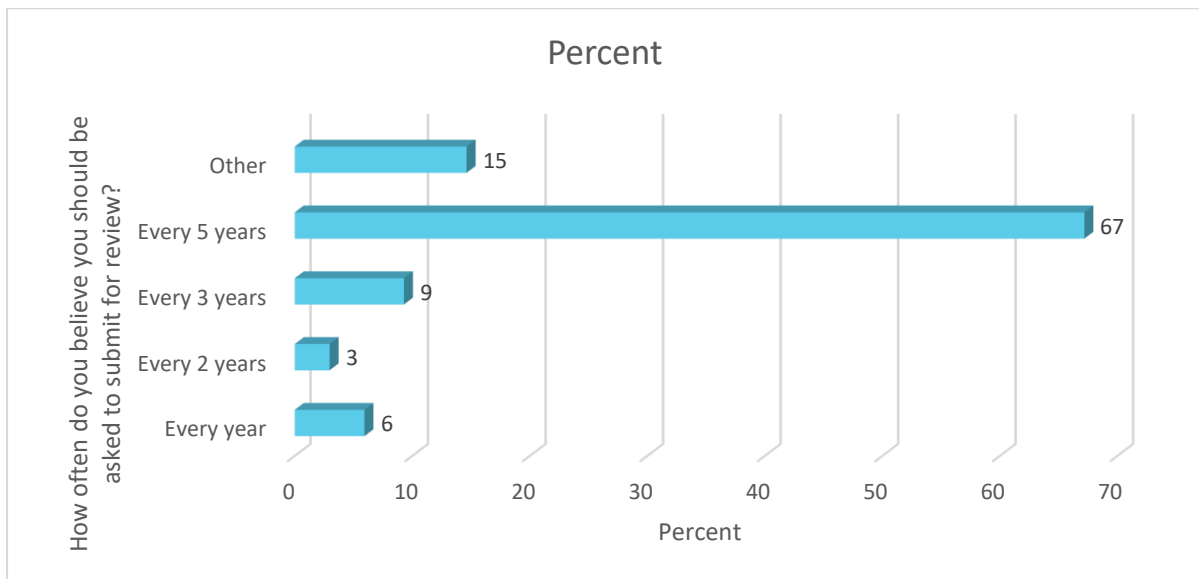| Answered	514
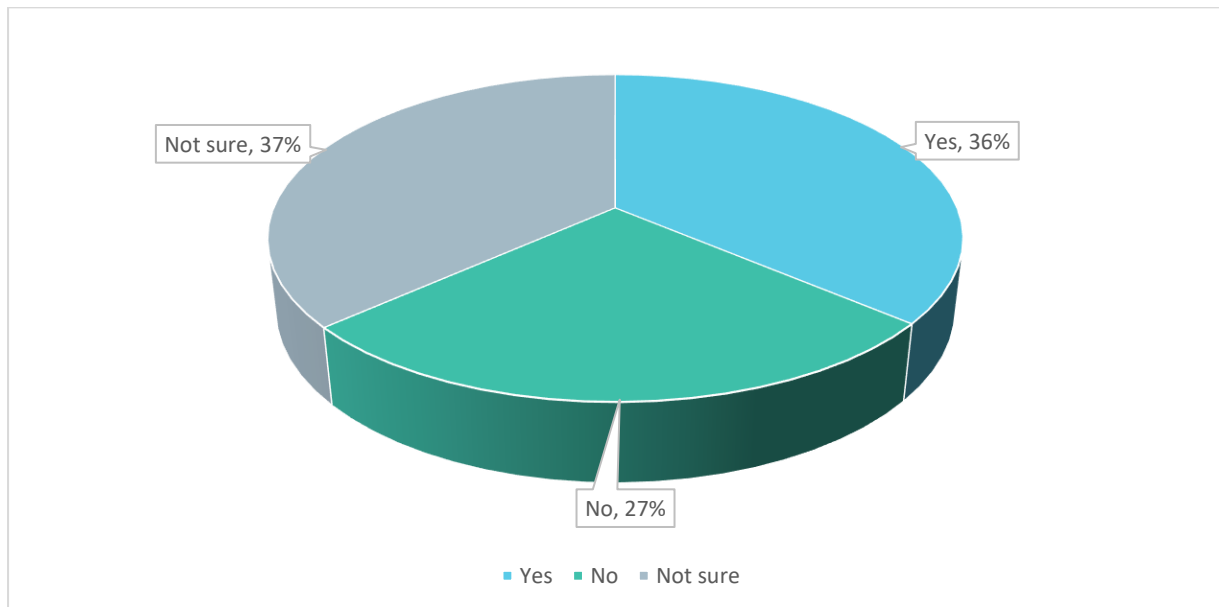
A comment box was provided with the question. A list of the responses (191) is available at Appendix 3. The most common themes identified under this question are:

Theme	Number of responses
System is too time-consuming/burdensome/tick box/needs simplification	71
The system/CCF/CCSAT is not applicable to all pharmacy practice areas	20
Positive comments about the system	12
Criticism of Practice Review	11
Too unstructured/overly flexible	11
Preference for credit/points-based model	9
Preference for increased recognition of advanced practice/specialisation	8

Question 7: Is ePortfolio a useful tool to support you in completing outcomes focussed CPD, which improves your practice?

Answered	512

A comment box was provided with the question. A list of the responses (193) is available at Appendix 4. The most common themes identified under this question are:

Theme	Number of responses
Time-consuming/ complex/burdensome	51
Tick Box exercise	19
Benefit of having centralised place to store/structured recording of CPD	17
Doesn't improve practice/only encourages reflection	15
Repetitive	13
CCF not suitable/not applicable to all roles /not relevant to practice	9
User friendly	7
Not user friendly	5

Question 8: Pharmacists are asked to submit an extract from their ePortfolio once in every five years for review. How often do you believe you should be asked to submit for review?
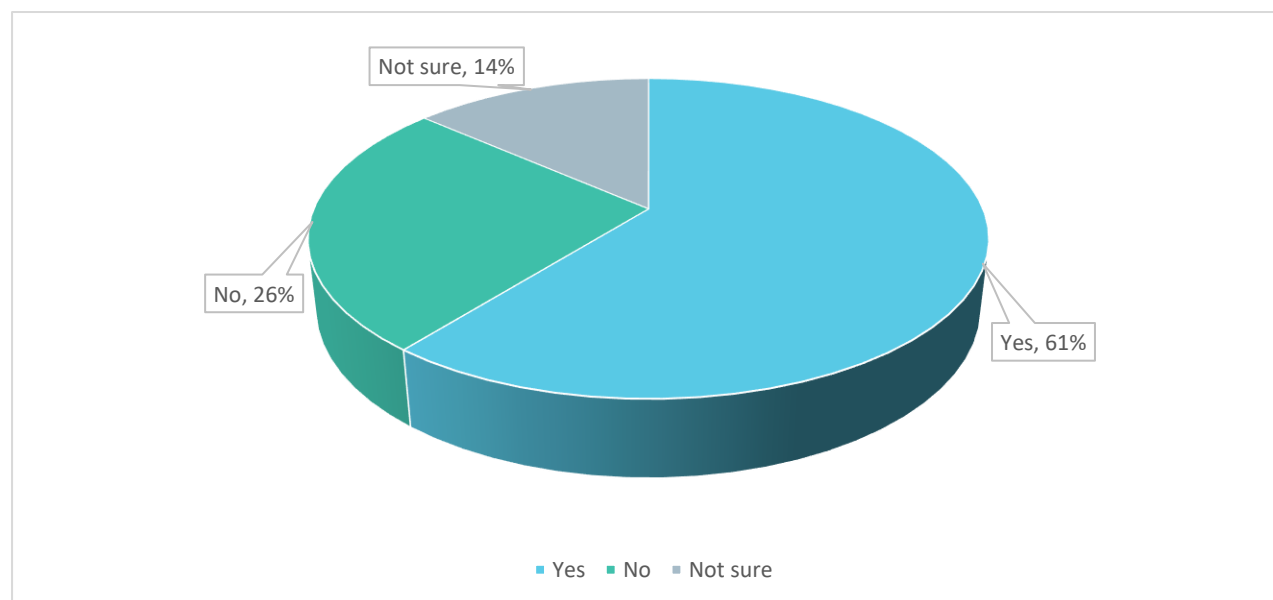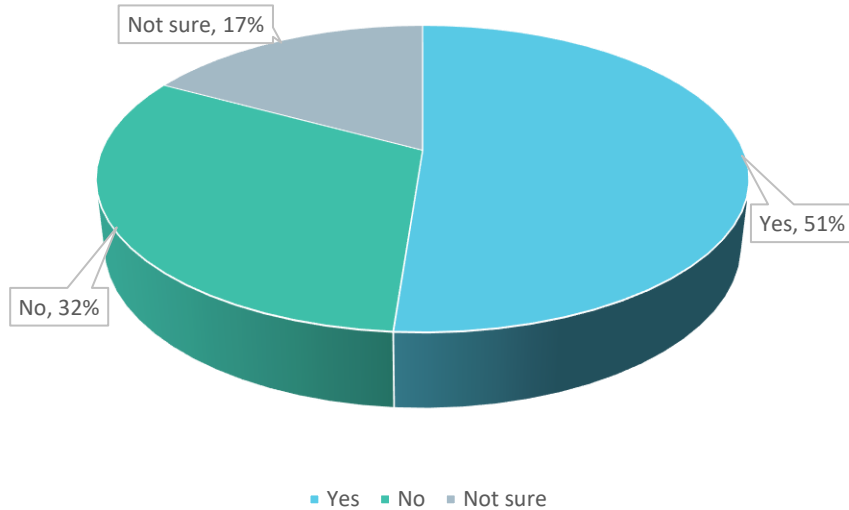
Answered	506

15% of respondents indicated 'other'. A comment box was provided. A list of the responses (74) is available at Appendix 5. The most common themes identified under this question are:

Theme	Number of responses
Never	16
Recognise attendance/participation in CPD events/points based system	12
Every 10 years	7

Question 9: Should evidence of CPD be a requirement of continued registration for pharmacists?

Answered	502

A comment box was provided. A list of the responses (148) is available at Appendix 6. The most common themes identified under this question are:

Theme	No of respondents
Trust/declarations should suffice/micro-management of pharmacists	18
Ensures pharmacists refresh knowledge/keep up-to-date/competent	17
Some learning is informal/takes place on-the-job/no time to record	9
Reflective piece is pointless/ points/credits should be accepted	9
Ensures people carry out CPD/ongoing development	7
Ensures patient safety/public confidence/trust in profession	6
Not in current format	6

Question 10: Should the PSI consider the inclusion of points based/hours-based learning as part of a reviewed model of CPD?
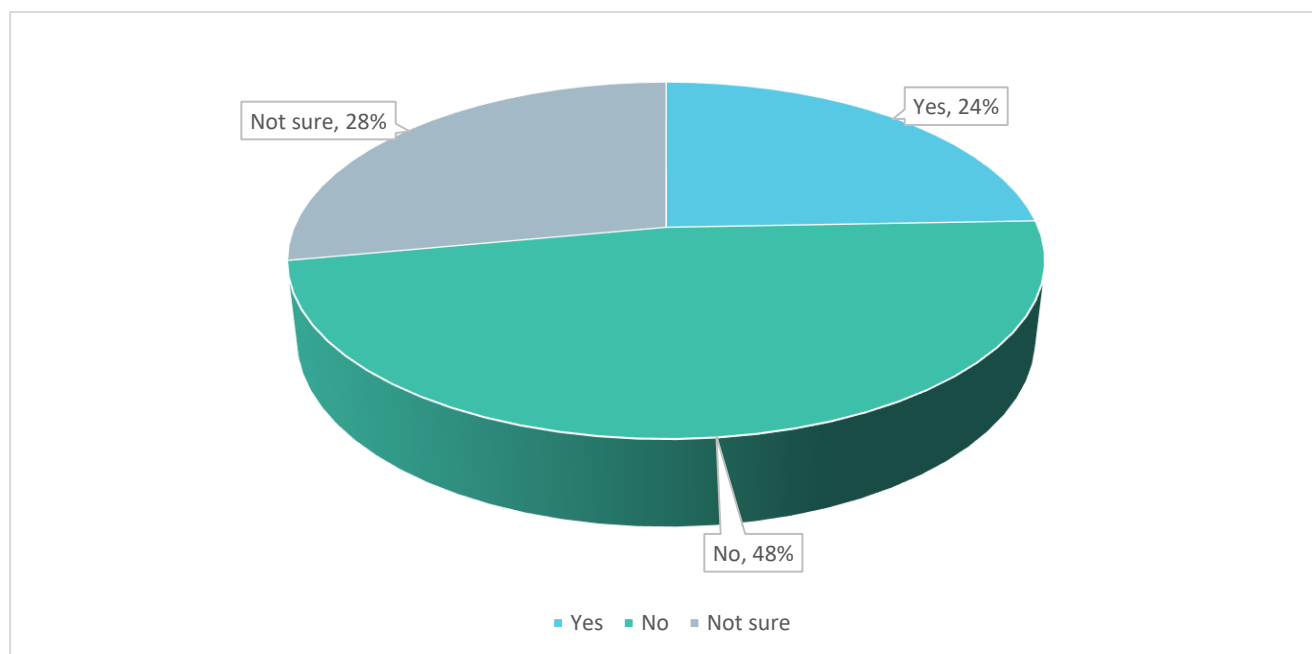
Answered	504

A comment box was provided. A list of the responses (161) is available at Appendix 7. The most common themes identified under this question are:

Theme	No of Respondents
Have model/ would be similar to other professions	13
Would be more meaningful/relevant/less burdensome/realistic	9
Would increase pressure/burden on pharmacists	9
Might become a tick box exercise	8
Have as a component of model	7
Dependent on availability of accredited courses/suitable to all roles	7

Question 11: Is Practice Review a useful tool to assure pharmacists are engaging in self-directed, outcomes focused CPD?

Answered	504

A comment box was provided. A list of the responses (176) is available at Appendix 8. The most common themes identified under this heading are:

Theme	No of respondents
Not appropriate/stressful/not fair/ insulting	30
Time consuming/restrictive/adds no value/expensive	17
Community focused/not suitable/relevant to all roles	15
Would increase pressure/burden on pharmacists	9
EPortfolio/CPD more appropriate/sufficient	7

Question 12: Under the Act, it is a function of the PSI to assure that registrants undertake appropriate CPD. Do you have any thoughts on how the PSI can best achieve this?

Answered	344

A list of the responses provided to this question (344) are available at Appendix 9. The most common themes identified under this question are:

Theme	No of respondents
Favour the introduction/inclusion of points/hours/credits based system	96
Positive comments on system/ePortfolio aspects of system	37
Make recording simpler/reduce paper trail	34
Criticism of Practice Review	26
CPD submission should be linked to annual continued registration	17
Greater potential for feedback/scope for peer to peer interaction/quality review	13
Criticism of CCSAT	8
Mandatory support/facilitation of CPD required by employers	9
Self driven/reflective CPD not suited to all	4

Email responses

Five responses were received by email. A number of themes arise in the email submissions including:

- Positive comment on aspects of the current CPD model
- Criticism of Practice Review
- Criticism of CCSAT
- Review of IIOP function
- Unsupportive of points/credit-based learning system

Discussion

521 pharmacists responded to the survey, accounting for 7.7% of the register. Over 64% of respondents identified community pharmacy as their area of practice, and 19% identified hospital pharmacy as their area of practice. (Question 2)

Of the phrases provided in the survey, respondents indicated that the following three phrases are the phrases that they would most like to see describe the CPD system:

- 'supports and drives professional development' (53%)
- 'flexible: allows pharmacists to identify and address their CPD needs in a variety of ways' (50%) and
- 'effective: assures pharmacists are undertaking meaningful CPD, that has patient impact'. (46%)

(Question 5)

The flexibility of the current model was identified as one of the top phrases to describe the current model (45%). However, similar numbers of respondents described the current system as 'overly time consuming /burdensome' (46%) (Question 4). This was a recurrent theme throughout the responses and comments received to the survey (see Thematic Discussion).

There were a series of mixed responses to many questions in the survey thereafter. Respondents were divided or unsure as to whether the current model supports practitioner development (Question 6). While almost half of the respondents (49%), identified the ePortfolio as a useful tool in supporting outcomes focussed CPD which improves their practice (Question 7), a similar number (47%) identified the Practice Review as not being a useful tool to assure pharmacists are engage in self-directed outcomes focussed CPD (Question 11). Criticism of the Practice Review process was another recurrent theme throughout the responses and comments received (see Thematic Discussion). Just over 50% indicated that they believe the PSI should consider the inclusion of points based/hours-based learning as part of a reviewed CPD model (Question 10).

The greatest consensus to the survey questions were received to Questions 8 and 9, where 60% agreed that evidence of CPD should be a requirement of continued registration of pharmacists. 67% indicated that they believed they should be asked to submit for CPD review every 5 years.

Thematic Discussion

While positive feedback was received on the current CPD model, the following themes also recurred throughout survey responses, which were more critical of the model:

1. ePortfolio recording system requires simplification/streamlining
2. Preference for a credit/hours-based model or inclusion of credit based system
3. Criticism of Practice Review
4. Criticism of CCSAT/relevance to all areas of practice

Themes 1 &2: A Simplified System: A Credit Based Model

A key theme arising throughout the survey responses was the preference for a simplified method for recording CPD activity undertaken. Respondents described the ePortfolio cycle as being cumbersome, time consuming, and meaningless. Respondents complained that the time spent to complete the narrative sections of the ePortfolio would be better directed to CPD learning, and did not appear to feel the benefit of the outputs based model in place. Some respondents believed that evidence of training undertaken (e.g. certificate) should be sufficient to meet CPD requirements, and many referenced the CPD systems of other health professions in this regard, which operate credit based or recognise hours of CPD undertaken by practitioners. Some respondents noted that a blend of credit based CPD and portfolio submissions may be a more appropriate mechanism for CPD review.

PSI Response

The PSI has noted these opinions and will, in the next steps of the review, examine of the value of an outputs based model for CPD, the value of points/credit based models of CPD and the potential for a blended model. The PSI is grateful for the feedback received in this regard.

Theme 3: Criticism of Practice Review

Another common theme throughout the responses to the survey questions was criticism of Practice Review. Respondents were critical of this aspect of the CPD system on grounds that:

- it was too costly to deliver,
- it is unfair that only some pharmacists are selected
- the review is unsuitable for patient facing pharmacists in hospital roles
- it should only be used where there are concerns about a pharmacist's practice
- it is not employed by other health professional or regulatory bodies
- it is no longer employed by the Ontario College of Pharmacist, upon whose system, the model was originally based.

PSI Response

The PSI welcomes the feedback received and shall ensure that the purpose and function of the Practice Review, its relevance to CPD, and the appropriateness of the link between CPD and competence are included as part of the scope for the CPD Model Review.

Theme 4: Criticism of CCSAT and Relevance of the CPD Model to All Areas of Practice

Many respondents expressed concern in responses that the CPD Model was not relevant, or did not consider pharmacists in practice settings, outside of patient facing or clinical roles. Some respondents felt that the current system was not applicable to pharmacists in industry settings who have on-going training requirements as part of their roles. Respondents also criticised the Core Competency Self-Assessment Tool (CCSAT) as unhelpful in identifying relevant CPD needs.

PSI response

The CCSAT is a tool, originally created to assist pharmacists in their self-evaluation of learning needs against the core competency framework for pharmacists (CCF). The PSI and the IIOP have received

commentary on the applicability of the CCSAT previously. While the tool may be helpful to some pharmacists, particularly those in community practice, pharmacists are no longer required to use the tool application, specifically, as part of their submission for ePortfolio Review. Instead, pharmacists can make submissions for the review on the basis of their own reflection on the core competency framework. The Core Competency Framework which is the underpinning structure of the CCSAT is currently under review. The feedback that the CCF has lower applicability in the context of CPD, and various practice settings, has been received by the PSI through the CCF review project and this matter has been included as part of the CCF review process.

Additional themes

Other themes, which arose to a lesser extent across the responses received included:

5. **A Reflective CPD Model & Feedback.**
   Some respondents queried the suitability of an entirely reflective model for identification of learning needs, noting that it may not suit all pharmacists. Other pharmacists noted the value of peer to peer discussion in CPD and others expressed a preference for greater inclusion of quality assessment as part of the ePortfolio Review system, or that feedback would be provided as part of the ePortfolio process.

   PSI response:
   These comments are noted and will be considered as part of the on-going review of the CPD model.

6. **Greater availability of training programmes**
   Some respondents requested greater availability of CPD programmes through the IIOP.

   PSI response:
   These comments are noted. The costs and resourcing associated with the delivery of the current CPD Model can impact on the availability and delivery of CPD programming through the IIOP. Pharmacists are reminded that they are not restricted to CPD programming offered by the IIOP, and that the flexibility within the current model allows for pharmacists to identify learning in a variety of ways including formal and informal learning.

7. **Mandatory CPD Support from Employers**
   Some respondents called for an onus to be placed on employers to allocate 'working time' for the completion of CPD activities.

   PSI response
   These comments are noted.

8. **Advanced practice/specialisation**
   Some respondents indicated a preference for a CPD system that recognises advanced practice/specialisation.

   PSI response:
These comments are noted. The CPD model in place, and in particular the flexibility in the model, was hoped to be supportive to pharmacists in a variety of practice settings and at a variety of development stages across a pharmacists career. The concept of providing for advanced practice/specialisation has

also arisen in the context of the PSIs review of the Core Competency Framework for pharmacists. The PSI are aware of the ongoing interest in this area and will ensure that the review of the CPD model will recognise the need for the system to be applicable to pharmacists, who practice in different settings and across a pharmacist's career development.

Nest Steps

The PSI will use the data from the survey to inform the scope of the CPD Review Project. This project has been given a multi-annual timeline under the PSI Service Plan 2021. The project sits under the PSIs strategic commitment to Advancing the Role of Pharmacy and Pharmacists in the Future Integrated Healthcare System.

Acknowledgements

The PSI would like to sincerely thank all those pharmacists who completed the survey or provided feedback via email. Your participation is very much appreciated.