



Attachment A: NSW Branch of the Pharmacy Guild of Australia - AHPRA Registration Report

The NSW Branch of the Pharmacy Guild of Australia (Guild) has asked for feedback from its members and their employees on their experiences with the AHPRA registration process in order to support a general submission from the Guild to the Senate Inquiry into the administration of health practitioner registration by the Australian Health Practitioner Registration Authority (AHPRA). This report covers the Guild's three major areas of concern:

- 1. 2011 interns seeking provisional registration**
- 2. 2010 interns seeking general registration**
- 3. general registration issues**

The transition from student to intern (Item 1) and from intern to general pharmacist (Item 2), in particular, are areas of great concern to the Guild, as demonstrated in the communications from respondents in the following sections.

Issues and problems in each of the three areas are listed at the start of each section, along with recommendations that may alleviate these issues.

This report contains correspondence received by the NSW Branch of the Guild in response to a request for feedback on pharmacists' and interns' experience with the AHPRA registration process which highlights areas of concern in AHPRA's performance. The names and workplace of the correspondents have been de-identified in the interests of their privacy. The original correspondences including the names of the correspondents have been retained by the Guild and are available to the Senate Inquiry to verify the authenticity of the report, but only in the strictest confidence, in order to protect the privacy of the correspondents.

1. 2011 interns seeking provisional registration

Issues/Problems:

Inefficient registration process

Delays in registration process

Communication issues

Intern hours not recognised for supervised practice requirements

The slow processing of provisional registration applications has led to the following problems/issues:

- Intern hours worked before the application process is completed do not count towards the intern's supervised practice requirements.
- Interns on 12 month contracts (for example in the public hospital system) will not be able to complete their requirements within the contract period.
- Delays in the next cohort of interns seeking intern positions. This is due to the current interns requiring extra time to complete their 1824 hours of supervised practice.

Recommendations:

- Pharmacy students should be prompted to submit applications for provisional registration prior to graduation, allowing AHPRA to complete most of the process prior to the confirmation of final exam results. Processes must be streamlined to improve efficiency when universities notify AHPRA of successful course completion.
- Implement proactive communication with students so they are aware of the status of their application. When issues with an application are identified, there needs to be prompt communication with the student to allow them to expeditiously correct the problem.
- For this year's (2011) interns, the hours worked from AHPRA's receipt of the provisional registration application should be allowed to be counted towards the required 1824 hours of supervised practice. This will prevent employment problems for the next cohort of interns in 2012. It will also allow interns on 12 month contracts to complete their requirements within the contract period.

Correspondence from 2011 interns

Email from 2011 [Intern No. 1](#) (6th April 2011)

Issues Raised: *Delays in registration process, intern hours not recognised for supervised practice requirements*

Thank you so much for allowing us to have a say in this regard and I would like to mention one major point.

As you know a great deal of the interns this year got registered very late, as some of us started working as early as December in order to finish early. I think if AHPRA can allow students to record their hours before they got registered as some of us did not know that the recorded hours will be only after they get provisionally registered with AHPRA. I think this step if taken will make many interns happy and will show that AHPRA is willing to understand that they were late in registering the students.

Email from 2011 [Intern No. 2](#) (10th April 2011)

Issues Raised: *Delays in registration process, intern hours not recognised for supervised practice requirements*

I received the fax from the guild about the submission to the senate inquiry into AHPRA and I just wanted to tell you of my dealings with them this year. I graduated the Master of Pharmacy program at Newcastle University last December and filled in my Application for provisional registration and application for supervised practice and mailed them before Christmas. February came and I began to get concerned that I still hadn't heard from AHPRA so I decided to call and email them. 2 weeks later I get an email back saying that they received my application on the 4th of January and it was being processed. The registration went through on March 8th and all the work I've done prior to this date does not count towards the mandatory supervised practice hours. I'm very annoyed with the length of time AHPRA took and its going to take me much longer to complete my pre-reg year.

Email from 2011 [Intern No. 3](#) (2nd April 2011)

Issues Raised: *Inefficient registration process, delays in registration process, communication issues, intern hours not recognised for supervised practice requirements*

I am a new intern, and submitted my application in the last week of December 2010. After 6 weeks without contact, I rang AHPRA to see how my application was going and was told that it had been received in the first week of January, and to expect it to be processed within the next 2 weeks.

After the 2 weeks had passed, and still no contact, I rang again and was told that it was still being processed and that they would contact me soon. The contact that I received was a generic bulk email stating that they had received my application and that it was being processed and the expected wait was 6 to 8 weeks. I rang again, to be told the same thing.

At week 9 (of them having my application) I received an email from the head of the midwives board saying that my supporting documentation had not been endorsed correctly, and that I needed to resubmit it. I was confused as to why the midwives board was contacting me, and worried they were trying to register me

incorrectly! So I rang again and was told that even though they had had my application for 9 weeks, they had only just realised the supporting documentation was wrong, and I did need to send it again - so I did.

I was finally provisionally registered on the 17th of March 2011, 10 weeks after my application was received. In this time I had worked over 400 hours, which are not allowed to be counted toward my provisional registration hours, basically putting me 10 weeks behind. I would not have usually worried about something like this, but feel that since they acknowledged the receipt of my application was in January, that someone should have assessed it for validity at that point and that I should have been notified then, not after 9 weeks of waiting.

Email from 2011 [Intern No. 4](#) (10th April 2011)

Issues Raised: *Delays in registration process, intern hours not recognised for supervised practice requirements*

My name is (Intern 4) and I am currently a 2011 intern pharmacist. I had lodged my application in around November and started working as an intern on the 29th of November. However according to the AHPRA website I am registered as off 31st of January. This omits 2 months (9 weeks, roughly 360 hours). I believe this is unfair and requires review.

Email from 2011 [Intern No. 5](#) (7th April 2011)

Issues Raised: *Delays in registration process, intern hours not recognised for supervised practice requirements*

I am currently an intern working in a metropolitan hospital pharmacy. I was granted provisional registration one and a half months *after* starting employment, regardless of the fact that I had submitted the correct paperwork weeks before starting my intern year. As a result, my 12 month contract as an intern will not be able to fulfil the required hours of supervised practice, as one and a half months of supervised practice will not be recognised by AHPRA.

This has put unnecessary pressure on myself, my preceptor and the hospital I am currently working in. Personally, I feel very anxious knowing that at the end of my contract, I will need to find further employment, or supplement my current job with casual work in a pharmacy on the weekend. Although the latter option is plausible, it is largely impractical. As an intern, it is stressful enough dealing with full-time employment, responsibilities within the hospital such as intern tutorials, research projects and running continuing education seminars whilst completing an Intern Training Program as well.

AHPRA's performance in processing paperwork for provisional registration has been particularly poor and unsatisfactory. I feel that AHPRA as an organisation will need some serious assessment and evaluation.

Letter received via Fax (8th April 2011) from an Employer of a 2011 [Intern No. 6](#)

Issues Raised: *Delays in registration process, intern hours not recognised for supervised practice requirements*

With regard to your letter regarding problems experienced with AHPRA and the registration process I would like to inform you of the following.

My intern pharmacist No.6 posted her application to AHPRA on 6/1/11. She started working 10 days later on 17/1/11. This normally would have been sufficient for the Pharmacy Board of NSW to complete the registration process.

No. 6 did not get confirmation of her registration as an intern pharmacist until 23/2/11. We have calculated the she worked 216 hours during this time which will now not be counted towards her total hours required.

I find this unacceptable in that we now will have to employ No.6 for 216 hours more at the end of this year to meet the required target which also causes an unnecessary delay in her earning potential next year.

I believe that AHPRA should be able to accept a signed statutory declaration of No.6's hours worked to allow her to fulfil her obligation of hours required.

Email from 2011 *Intern No.7* (10th April 2011)

Issues Raised: *Delays in registration process, intern hours not recognised for supervised practice requirements*

My name is *Intern No.7* and I am an intern pharmacist. I am just writing to have my input into the senate inquiry into AHPRA and the issues that I have had with the new registration system.

I submitted my form for provisional registration as a pharmacist and application for approval of premises for supervised practice on 23rd of November 2010. AHPRA have documented that they received my form on the 24th of November 2010. It was the impression by most graduating pharmacy students at the time that if we had our forms into AHPRA by the end of November 2010 that they would process the forms and then just wait on our University grades and completion to finalise the registration process. This meaning that as our completion of our university qualification was released we were able to practice.

My registration was not completed and finalised until January 18th 2011. I am sure you are well aware that intern pharmacists need to accumulate a specified number of hours in order to sit exams and be eligible for general registration as a pharmacist.

I, like most other newly graduated pharmacists started working straight after our studies in December and are all quite upset that our hours will not count until the day of actual registration. Firstly I do not think this is fair as if I had known this prior to starting my job and internship then I would have waited and done things differently. I have pretty much wasted a month on working from the time I started until registration. I had been working unregistered for a month without knowing what was going on and whether I was registered or not. I had made sure I sent off my forms to AHPRA to give them sufficient time as outlined in the forms and on their website.

I have made several phone calls to AHPRA in regard to my registration. Firstly I wanted to see if I was actually registered after receiving an email from them. They were quite happy to take my money a couple of weeks before my registration was finalised. They had told me they had received my forms back in November. Secondly I have called them to see how my approval of premises for supervised practice was as I have two locations I wish to seek approval for. They could not tell me anything in regard to this. I am hoping that this is fine as I do not want further hours wasted if my work place has not been approved or the appropriate paperwork has not been filled out.

I feel this process has disadvantaged me and many other intern pharmacists and I think as a whole we would all like our provisional registration back dated to when our university qualifications were completed and

confirmed. I should not be disadvantaged due to a new registration system and neither should my fellow graduates.

I hope this enquiry can resolve these issues and make for a fair and hassle free process for the future.

Email from 2011 [Intern No.8](#) (6th April 2011)

Issues Raised: *Delays in registration process, communication issues*

My name is *Intern No.8* and I am currently undertaking my intern year.

While the actual registration process itself was easy enough to follow, the length of time it took for my provisional registration to be processed was ridiculous.

I sent in my forms at the beginning of November, I was contacted regarding a slight problem with my form and then payment was taken from my account on the 31st December. I started work at the beginning of December and thankfully my preceptor was understanding of my difficulties as I was not listed on the AHPRA website until the 21st of January.

Frustratingly, I know of many other interns who submitted their forms after me and were registered before me.

The other irritation I have with AHPRA has been their lack of response to any online enquiries I have submitted to them, despite the website saying this is their preferred form of communication.

I hope this information is useful to your submission.

2. 2010 interns seeking general registration

Issues/Problems

Inefficient registration process

Delays in registration process

Unnecessarily bureaucratic administration

Pharmacist rostering difficulties

Impact on employer/colleagues

Additional fees

Loss of income

Financial stress

Communication issues

Complaints handling

Problems/Issues occurring due to the slow processing of registration applications from 2010 interns:

- Loss of income due to not having general registration, despite passing Pharmacy Board of Australia (Board) examinations, completing the supervised practice requirements and the *Intern Training Program*.
- Cost of having to re-register provisionally whilst the application for general registration is being processed. To maintain the ability to work as an intern, provisional registration must be maintained. Some 2010 interns have had to pay for both provisional and general registration applications.
- Pharmacy owners have been unable to plan ahead with pharmacist rostering due to uncertainty of the registration status of their 2010 intern.
- Interns who have completed all their requirements for general registration in their supervised workplace and are no longer employed have been unable to gain employment as a pharmacist until their general registration is processed and approved.

Recommendations:

- Ensure that the transfer from provisional to general registration is completed in a prompt manner to ensure smooth transition from intern to pharmacist
- Review processes from previous State Boards to identify and apply those that were efficient and effective
- Interns seeking general registration for the first time should be able to submit an application prior to completion of intern requirements. Payment would be made upon confirmation of status
- Provisional registration period to be extended beyond 12 months to allow sufficient time for Board requirements to be met without extra expense to interns

Correspondence from 2010 interns

Email from 2010 [Intern No.1](#) (4th April 2011)

Issues raised- Inefficient registration process, delays in registration process, unnecessarily bureaucratic administration, pharmacist rostering difficulties, impact on employer/colleagues, additional fees, loss of income, communication issues

I am an intern pharmacist (NSW) from 2010 – I am still waiting for my registration to be processed.

I completed my hours by November 2010 and successfully passed my oral examination (the results of which took 2 weeks to come through – prior to national registration it would have taken a few days) in the first week of March. I forwarded all my paperwork ASAP (having heard of the backlog of paperwork over the Christmas/New Year registrations). My current place of work has been very patient with regards to my registration – but are currently in need of a fully registered pharmacist to cover a maternity leave position asap. Unfortunately, every time I try and check the progress of my registration I am placed in long queues over the phone line, which is answered by another state, which then has to be re-directed to NSW. Throughout this entire process I have been charged roughly \$250 to renew my intern registration and \$450 to then apply for general registration (not including the costs of sitting the examinations). Recently, I received an email from one of the registration officers to say my application was on hold until I forward another copy of my CV – which I had sent in signed by my pharmacist manager deeming it to be true and correct – but this time I am required to sign it as being true and correct

I have a provisional licence, I have completed my hours, passed the written and oral exam, successfully completed an intern training program and have all the certificates and log books to prove all these facts – yet I am still working and being paid as a pharmacy technician and my application has apparently been placed on hold – after I very carefully ensured it was sent out the day after the positive receipt of my oral exam results.

It has been very frustrating from the very beginning.

Email from 2010 [Intern No.2](#) (8th April 2011)

Issues Raised- Inefficient registration process, delays in registration process, unnecessarily bureaucratic administration, pharmacist rostering difficulties, impact on employer/colleagues, additional fees, loss of income, communication issues

I was an intern from 2010 in NSW and was told to forward my problems and concerns with the AHPRA registration process to you for the upcoming senate enquiry.

I along with most of my colleagues experienced continual problems with AHPRA and the registration process. I was told in late November 2010 that I was unsuccessful in the oral exam. After this point, I was told to re-register for the exam in order to sit again within the next oral exam period of February to March 2011. I was also advised that in order to continue working in pharmacy in any capacity, that I would have to re-register as an intern for the three month period before sitting the exam again, at which point, after completing it successfully, I would be required to pay again for my general registration. In essence I was told that I would have to pay two annual registration fees in a three month period. On appeal of this decision, and an enquiry that was made in order to receive my registration billed pro-rata, I was repeatedly told by phone and in person that the only way that I could have this problem looked at was to make a submission via email. I did this, and many weeks later was told that my email would be forwarded to the relevant registration department. I have enquired as to the progress of this appeal a number of times, and have never received any

reply. As a result, I have had to pay registration fees twice. I also only received confirmation of my re-registration as an intern pharmacist on the day of receiving my results of the second oral exam. In essence, I had to pay for a three month period in which I was technically not even registered in the first place.

I have since passed my second attempt at the oral exam, and since then have had numerous problems with the mis-information received from AHPRA as well as what seems to be unnecessary red tape. For example, all interns who passed the exam were sent a letter to notify them. On receipt of this letter, interns were required to photocopy the letter, have a Justice of the Peace certify it, and then return it to AHPRA, the body that issued the letter in the first place. In addition, many of my colleagues have had substantial waiting periods before their registration was finalised. I sat my oral exam on the 28th of February, for example, and am still yet to receive my registration number. I hand delivered my application papers the day after I received my result (as I was told by colleagues that they had had their applications delayed due to lost applications as well as a "nine day delay in the mail room"). Despite this, two weeks after delivering my application, I was notified by email that my application had only just been received. I find this difficult to comprehend due to the fact that I personally delivered these documents. Every day I am not registered as a pharmacist means that I am not being paid the wage that I am entitled to. I also cannot apply for jobs, as I am currently unregistered. This means a large proportion of my savings are going towards supporting myself as I am without a wage that I am legally entitled to. Contacting AHPRA about these matters is also typically near-impossible, with emails continuously ignored and telephone calls not only requiring exorbitant call-waiting periods but then on finally being transferred to the person "responsible", receiving their voicemail account. I have never been called back regarding any of my enquiries, of which I have made many. This is just my experience with the registration process in AHPRA. Many of my colleagues have been sacked from the jobs they had lined up as pharmacists after their oral exam as employers required registered pharmacists to work in the positions. Registration took so long in these cases that financially, employers could not keep these workers. Given the fact that evidence must be submitted prior to the oral exam that the written exam had been completed, there seems to be no reason for the process to take so long (often 2-3 months), given the fact that AHPRA were in fact the body that passed these candidates.

Thankyou for your interest in the problems associated with the registration process, and please let me know if I can provide you with any further information.

Email from 2011 [Intern No.3](#) (11th April 2011)

Issues raised: Inefficient registration process, delays in registration process, pharmacist rostering difficulties, impact on employer/colleagues, loss of income, communication issues

This email is in reply to the Pharmacy Guilds senate enquiry into AHPRA. What a huge mess registration was.

I sat my oral exam on the 7th of December which was the final day of examination. I was allocated with people who had failed their August Written exam and who had not passed until the resit in October. Not only was our exam an hour or two late due to appalling organisation and gross understaffing, our exam was quickly stopped half way through due to "server" issues. We were not informed what was wrong, how long it was expected to last and whether our exams were still valid.

People who failed were compensated by having a refund and a free re-sit of their next written exam. The rest of us still dished out the full amount for our exam despite the stress!

My application was posted on the 10th of January by registered post. I waited a few weeks before attempting to contact AHPRA to ensure my registration was received (I was prompted to do so as our new hospital interns had their paperwork lost by AHPRA, with one of their friends being registered as a Physiotherapist instead of a pharmacist – at least she got registered at all!).

I was due to start work as a locum pharmacist at XXXX hospital on the 1st of February, so my employer composed a letter to the board stating the urgency of my registration (there hospital was going to be down a pharmacist). As February approached I contacted the board again to check my application, the lady I spoke to

had yet to pass on the letter from my boss to the appropriate person. She also informed me my application would not be processed faster despite my circumstances and the fact that a hospital was now down a pharmacist.

As a result my boss as the director of Pharmacy for all of the XXXX area health service has to completely reallocate our pharmacists to compensate for my lack of registration and ability to practise. I was luckily kept on as an intern by my Boss which I know isn't the case for many applicants. If I wasn't kept on as an intern I would have been unemployed from the date of my contract termination which was the beginning of January.

I continued to contact AHPRA at least once a day to ensure they felt my urgency. At the end of February I was delighted to be told that my application hasn't been looked at for a week as the registering lady was away sick, and may be for some time, and unfortunately there is no one else there who can do her job. Sorry. I find the appalling from a health board, if we have workers away we simply don't say oh well that ward won't be covered today, we get together and get it done! Poor attitude all round.

I was finally registered on the 8th of March.

I lost two months worth of pharmacist wages, XXXX base hospital was down a pharmacist for two months, my cortisol levels were through the roof and god knows how much the hospital's phone bill was after I sat on hold for hours a day.

Email from 2010 *Intern No.4* (8th April 2011)

Issues Raised: *Inefficient registration process, delays in registration process, impact on employer/colleagues, loss of income, financial stress*

I was an intern pharmacist in 2010. My experience with AHPRA/registration is as follows:

- My employer was not able to offer me regular full-time employment (as an intern pharmacist or otherwise) until such a time that I was registered.
- I tried to compensate for my lack of income by using all of my available sick leave, annual leave and entitlements, until I had no further such sources of income available to me.
- I took 2 weeks off work on unpaid leave.
- What hours I did work, were still at my intern pay-rate (roughly half what I would have been earning otherwise).
- Caused considerable financial distress with several major bills and loan repayments overdue.
- This had flow on effects as I had originally budgeted for a substantial increase in my income after my 'full' registration was complete.
- Total application processing time (from date of receiving application): 9 weeks
- Approximately \$4000 less income was earned than what would have been under the "old" registration system

Email from 2010 [Intern No.5](#) (5th April 2011)

Issues Raised: *Inefficient registration process, delays in registration process, unnecessarily bureaucratic administration, loss of income, financial stress*

I have a couple of things to say about AHPRA

Firstly the amount of time between Oral Exams. I did my intern pharmacist year in 2010 and sat my first oral exam on the 9th of November 2010. I failed that exam which was entirely my own fault. However the wait for the second round of orals was ridiculous. My second exam was on the 9th of March 2011. I think that having to wait four months to re-sit that exam was outrageous and in the end cost me a fair bit of money in lost income as in that time I was still being paid intern wages. I think one or two months at the most would have been a reasonable wait, not four.

This brings me to my second point. Having passed the second oral exam I am currently enduring the wait for AHPRA to process my general registration. When I rang AHPRA to enquire about how long this would take they told me six to eight weeks. This is just ridiculous. It shouldn't take that long to process. I was told that the majority of the wait was because criminal background checks can take up to 3 weeks to complete however I have been reliably informed that the NSW Department of Education can get a criminal background check done in 24 hours. The reason I think it is taking them six to eight weeks to process registration applications is because they are disorganised. When I rang AHPRA one week after posting my application they hadn't received it, despite the fact I express posted it. Half a week later it had "arrived" or as I see things, it sat in a pile of unopened mail for a week before anyone bothered to open it. It shouldn't take them over a week to open their mail. Again this is costing me money in lost income as my intern position has come to an end and I can't get any work as a pharmacist until I am registered, which according to AHPRA will be in another four to six weeks time.

Email from Employer of a 2010 [Intern No.6](#) (1st April 2011)

Issues Raised: *Inefficient registration process, delays in registration process, pharmacist rostering difficulties, impact on employer/colleagues, loss of income, communication issues, complaints handling*

I employ pharmacy *Intern No.6* is from (a small country town) and studied four years of Pharmacy at CSU in Wagga.

She sat her final exams in Sydney on 26 November 2010 and passed. Her **provisional** registration number is PHAxxxxxxxxx.

She then had to submit her application to AHPRA which was sent by Express Post on December 14.

In a classic case of bureaucratic incompetency, she is STILL not registered to practise as a pharmacist.

I have had to cancel leave on two occasions as she has been unable to cover for me. I actually have to work tomorrow morning instead of No.6 as she cannot work without her registration.

She is financially disadvantaged herself as she is not being paid as a pharmacist. Luckily for her she has a job with me, as she would be unemployable in the marketplace without her registration.

I have emailed AHPRA once requesting a call back that never came. I have phoned them twice. The NSW Office is virtually uncontactable. When you do finally get through to AHPRA, they are unwilling to help me as it "doesn't concern me" I was also told that "I don't see why this is your problem..." The staff there are no doubt working under stress but in my experience they have been rude and most unhelpful. No.6 has spoken to them on numerous occasions and been told "2-3 weeks" then "4-6 weeks" but still no registration.

A time delay would be expected due to the large numbers being registered, however the inconsistency is frustrating. A fellow graduate sent his papers in four days before her and has now been registered for 3 weeks. Another graduate sent theirs in a week after No.6's and has now been registered for the last week.

AHPRA actually have a complaints page on their website but after filling it in I realise I have to send it to AHPRA themselves....

I waited an hour on hold yesterday with AHPRA and when I was finally put through I was told that they couldn't speak to me as I am not the applicant.

My intern's delayed registration has cost her in lost wages and cost me a holiday.

What are they doing?

Email from 2010 [Intern No.7](#) (6th April 2011)

Issues Raised: *Delays in registration process, loss of income, financial stress, communication issues*

My name is *Intern No.7* and I attained general registration as a pharmacist. I called AHPRA several times before eventually getting an answer on the 25/1/11 asking about my registration application and was told I would receive an answer within 72 hours. After this time had elapsed I called back (on the 31/1/11) and was told that my application had "not been received". Upon this notification I contacted Australia Post where I was informed that my article had "definitely been delivered on the 23/12/10", I therefore passed this information on to AHPRA who then found my application. I waited for 8 weeks for registration (and have been told that this is "normal") and consequently have lost over \$14000 in potential income (I had no work as I was unregistered and I am now earning \$1,800 per week).

Never were we informed that such a wait was possible. The pharmacists from the years before had been registered in 2 days.

As a first year out graduate who did not receive government support at university I had accumulated debts whilst studying. I used my intern year to pay these debts but I was not able to save money. After 8 weeks out of work I was struggling to pay bills and had this period extended by probably 2 more weeks I would have not been able to pay rent and would have lost my house.

I would like anyone undertaking this inquiry to imagine themselves with no income for 8 weeks and ask if this is acceptable.

This incident has been very stressful and it seems to be avoidable if more staff were hired. 8 weeks is an unacceptable time to wait for registration and it was surely known how many interns would apply for registration so why was it not prepared for?

The staff I spoke to were all helpful and I don't wish to blame any of them but I would like to make the disgraceful organisation of the registration process known.

Email from 2010 [Intern No.8](#) (10th April 2011)

Issues Raised: *Inefficient registration process, delays in registration process, pharmacist rostering difficulties, impact on employer/colleagues, loss of income, communication issues*

I was an intern in NSW in 2010. My oral exam was conducted on Wed 20th October 2010 and I did not receive results for this until two weeks later. In previous years prior to AHPRA in NSW the intern was notified via express post two days later. On receiving my letter of passing the oral exam, I completed my hours and expressed posted the forms to AHPRA on November 30th 2010. I tried to call twice over next few weeks to find out what was happening with the process and the length of wait, both times I hung up after being on hold for over 20 mins. I was not registered until 21st of December 2010 and only found this out by looking on the AHPRA register of practitioners & was eventually sent an email a few days later. While this may be faster than many of the other interns from 2010, people in the industry would be aware that Christmas/new year period is the busiest in pharmacy and I was unable to work as a pharmacist during the busiest month when my place as a pharmacist was needed at my current workplace. My boss and colleagues here not pleased with the process and the fact I was unable to practice as a pharmacist after fulfilling all requirements to do so. There needs to be faster approval & registration numbers released sooner, so that interns can start working as registered pharmacists. As previously under the NSW board of pharmacy, an intern was given a number to practice within days of sending forms in, this needs to continue so that interns are required to work & have completed all aspects of process are not disadvantaged in any way.

Email from 2010 [Intern No.9](#) (6th April 2011)

Issues Raised: *Inefficient registration process, delays in registration process, unnecessarily bureaucratic administration, additional fees, loss of income, communication issues*

My dealings with AHPRA started in December last year. At this time I was an intern only waiting for my hours to be completed. I rang AHPRA to clarify when my intern registration would expire. I was told that my registration as an intern would expire with the end of the year and that I had one month's grace before my name would be removed from the register. I was then informed that as AHPRA could not guarantee that my general registration would be processed before my intern registration would expire and as a result I had to re-register as an intern.

I sent my application to AHPRA in the second week of January. As it was express post I checked the tracking number and know that it arrived the day after I sent it.

By the last week of January AHPRA had not contacted me on any matter. I emailed to check on the progress of both my registrations (intern and general). The reply I received did not answer my questions and was a generic response stating that my renewal (intern) had not been received. As this was sent registered post I know that it arrived at the AHPRA office in late December. The response did not indicate where it was, if anyone had looked into it or offer any hope that this would be followed up. As a result of this email I called AHPRA and spoke to someone in the NSW branch who was responsible for the registration of pharmacists. I was told that they would change the status of my intern registration to "received" so that I would not be removed from the register. They could not tell me where my intern registration was up to. Furthermore, even though this person specialised in pharmacist registration they could not tell me where my general application was (they explained that I should be in the next 'batch' they were to be given but that the paperwork was taken off-site to be scanned electronically before it would be processed). With this phone call I was assured that, "Due to your

situation I will write your name on a post-it note and once I receive the next batch of applications I will put yours at the top of the pile.”

Within 3 days of this my intern registration was processed.

I called approximately 2 weeks later to check that my general registration was now being processed. I was told that they it was not possible for them to physically view my application at this stage, that as long as I had completed my paperwork correctly my registration would be processed promptly and that there was no way that applications would be moved further up in the queue – a direct contradiction to my previous phone call. The most frustrating part of the waiting process was that I was in the dark for the whole thing. Each person you spoke to at AHPRA had a different story, it was impossible to be put back in touch with someone with whom you had previously discussed your application meaning that you had to explain it all again and not until the last week of the process was I able to ascertain that my forms were physically in their office.

Finally on the 21st February I received an email stating that, “You have omitted to provide identification supporting question 5.” I replied to this email but as I received no response I called AHPRA the next day. When I spoke to the person who had sent me that email she said that she had looked at my email and rechecked my paperwork to find that I had in fact provided all the documentation. My registration was finally processed on the 23rd February, approximately 6 weeks after it arrived in the office of AHPRA.

Giving grace for the 4 days it took to process applications this time last year, I have lost over \$4300 by not being registered.

The only thing that AHPRA has delivered on is that they have refunded my intern registration renewal fee at my request. In saying this they did email me to say that it would be returned to my bank account within a couple of weeks but it took more than a month for me to receive my money.

I have been frustrated at not being able to practice and the response from AHPRA at every stage. It makes no sense that the ‘progress’ we have made in going to a national system could be so much more onerous than the previous one.

Email from 2010 [Intern No.10](#) (5th April 2011)

Issues Raised: Inefficient registration process, delays in registration process, pharmacist rostering difficulties, impact on employer/colleagues, additional fees, loss of income, communication issues

I am an intern and just finished my intern year. The pharmacy I work in employs a pharmacist (Pharm Employee) who will be moving to XXXX when I am fully registered. I will then take over as the pharmacist when she leaves.

As we needed to plan for when (Pharm Employee) would leave so she could arrange her employment and accommodation in XXXX I emailed XXXX in December 2010 and asked him if the turnaround time for interns being registered for the first time would be still 6-8 weeks in April 2011 (when I would due to be registered). He replied that he expected it to be back to the 2-3 week turnaround by then as the backlog should be cleared.

Based on that information (Pharm Employee) organised her relocation to XXXX and secured rental accommodation as soon as I posted my application to AHPRA. To secure that rental she was required to start paying rent immediately.

I posted my application for general registration on 16th March 2011 by registered post. Australia Post had a record of my application being received on 21st March 2011.

(Pharm Employee) contacted AHPRA on 22nd March via their website to ask what the turnaround time was and when my application in particular would be completed. An email response was sent to my private email two days later to state there was no application for me and that they did not know what type of application was being enquired about. (Pharm Employee) clearly stated it was for pharmacist registration for the first time for an intern.

(Pharm Employee) telephoned AHPRA on Thursday 24th March and asked if someone could locate my application. She was informed that it was not in the system and could be still in the mail room or scanning room. (Pharm Employee) asked if she could speak to someone in those areas but was told to ring back on Wednesday as they were all in a meeting.

On Wednesday 30th March I rang AHPRA to try and locate my application. I spoke to XXXX several times that day who ended up asking me to contact XXXX via email which I did. On Thursday 31st March I rang AHPRA again as no one had contacted me. I was then informed that my application was now in the system and that there had been a backlog and they had to outsource the scanning of the applications to catch up. I was also informed that the turnaround time was 4-6 weeks because of the backlog.

On Monday 4th April I received an email to ask for 2 pieces of follow up information. One which was my fault for signing the CV incorrectly, and the other stating that my driver's license did not have the same address as my application. The driver's license did show the correct address via a RTA change of address label attached to the rear of the license. The licence had been copied back and front onto the same piece of paper and certified by a JP.

A turnaround time of 4-6 weeks (although better than some interns in the Nov/Dec period) is unacceptable in my opinion. Not only am I out of pocket for at least a month's wages as a fully qualified pharmacist but (Pharm Employee) has to pay rent on an apartment she can't move to for 6 more weeks, and my employer has to pay both intern and pharmacist wages for another month for this pharmacy when he should be paying just for a pharmacist.

Copy of Letter sent to AHPRA from 2010 [Intern No.11](#) dated 27th February 2011

Issues Raised: Inefficient registration process, delays in registration process, unnecessarily bureaucratic administration, communication issues, complaints handling

I am writing to AHPRA and the Pharmacy Board of NSW regarding the revolting stuff-up of my registration as a pharmacist in NSW.

I became registered as a pharmacist in June 2010. Refer to attached copies of certificates and payment made with the application for registration.

November 3, 2010, I received a letter from AHPRA regarding registration renewal. "If you have renewed your registration recently, you do NOT need to take any further action." I called AHPRA from work to confirm my registration did not require renewal as I had just been granted registration and turned the phone over to a colleague regarding their registration. I was told no action was necessary and my registration would be automatically transferred to the "National Registrar". I considered this quite confirming as I have always been told as a university student, PGTC student and during the written and oral examination from the Pharmacy Board of NSW.

February 2, 2011 I received a disturbing email indicating my registration as a health practitioner, was not renewed I quickly went to the AHPRA website and applied for a Fast Track Application along with a note regarding a mistake must have occurred with my registration status.

February 8, I finally received an email from AHPRA stating my enquiry has been escalated to an information/registration specialist who will advise me via email accordingly. No Fast Track Application was received, even though I applied for one.

February 20 I opened the post to find a disgracefully disheartening letter dated February 16, 2011, stating my registration as a health practitioner had lapsed. I was further flabbergasted when this letter indicated my registration should have been renewed prior to 31/12/10. How could this possibly be true? I went straight to the website to apply **again** for a Fast Track Application stating how can my status as a registered pharmacist have been changed.

February 21, ~9 a.m. I called AHPRA and talked with XXXX regarding my registration status. XXXX sent me the Fast Track Application via email. I waited with her on the phone to confirm I had finally received this form. She had no answers why I had not received an application, the lack of response and notification from AHPRA nor who the information/registration specialist was that I'm anxiously waiting to advise me about my registration. I further asked XXXX what documentation was required for the application and she had no idea. I asked her do I needHer response was, "I'm not sure, I haven't read the application form yet". XXXX also told me to register the application and send it via express post. I thought this seemed a little strange as well, so I asked the post-master when I posted the application. The post-master said you couldn't register, express post. It's already guaranteed to get to the destination the next day. I also asked XXXX if there was any one else I could talk to, especially who the information/registration specialist was. She was reluctant, but finally gave me XXXX's direct phone number. The three "specialists" were in a meeting at this time! I called XXXX's office and left four messages that day. None were replied. I continued to call XXXX's office the next couple of days with no reply. Needless to say, XXXX's assistance and knowledge regarding the Fast Track Application and its process was incredibly POOR! XXXX must be an awfully busy person to leave other pharmacists in the lurch like this while my registration, career and ability to provide for my family falls to the weigh side.

I called AHPRA again on February 23 to confirm my application was received and being processed. I spoke with a lady named XXXX who was lovely. She found my application and said she would personally hand them my application to be processed.

I forgot to ask XXXX how long it would take so I called AHPRA back again and this time got XXXX. XXXX instantly and with some attitude blamed me for my registration status being lapsed and that I should have known. How can a health professional/pharmacist know when they have never been told or alternatively misinformed throughout the entire university student to post-registration process? I highly doubt the latter is true. XXXX further said that I must have a date on my registration stating when it ends. I do not have such a date. Please refer again to the attached documentation/copies.

Obviously AHPRA has a lot of issues to iron out with the "national" registration system. It is quite unjust to have been over-looked and mistreated by AHPRA and their employee's. These last few weeks have been a nightmare trying to sort out a registration that should have NEVER had a problem in the first place.

I would like my case to be formally looked into and receive a timely response in writing on how my registration was mishandled.

Fax from 2010 [Intern No.12](#) 12th April 2010

Issues Raised: Inefficient registration process, delays in registration process, impact on employer/colleagues, unnecessarily bureaucratic administration, loss of income

I am writing in response to the notice from the Pharmacy Guild re the Senate Inquiry into AHPRA. I am a newly registered pharmacist and I would like to express my dissatisfaction at the time taken during the registration process. I feel that a period of six to eight weeks to complete the process is far too long. The pharmacy I work at hired two new interns while I was waiting for my registration and consequently had to cut back my working hours as it was not feasible for them to keep me on during my regular shifts. I ended up losing a substantial amount of income during this time as they could not keep me as a regular intern nor could they employ me as a fully registered pharmacist. I understand other interns actually ended up having their employment terminated due to the slow registration process. My preceptor was also very frustrated during this period of “limbo”. Although it may be a necessary evil, I also found the registration process to be very bureaucratic as AHPRA would delay applications for minor nuisances (e.g. CV not signed). I believe the registration process needs to be improved significantly so future interns do not have to contend with the same inconveniences I did.

3. GENERAL REGISTRATION ISSUES

Issues/Problems:

Inefficient registration process

Delays in registration process

Inefficient administration

Communication issues

Removal from register notification

Disciplinary/legal impact

Portability and availability of registration certificate

Complaint handling

Communication issues and registration delays leading to removal from the pharmacy register has had a significant impact on a number of pharmacists having to renew their general registration. Removal from the register without notice has meant that the pharmacist was practising as an 'unregistered' pharmacist, causing issues with indemnity cover and potential disciplinary action. In addition, as pharmacies must be owned by a 'registered' pharmacist, removal from the pharmacy register has the potential to affect pharmacy ownership arrangements. It is essential that the registration renewal process is streamlined to be as efficient and user-friendly as possible and that appropriate notification mechanisms are in place when issues with an application are identified.

Recommendations:

- Streamlining of the registration process with better trained staff and improved staff numbers if required to ensure pharmacists are not unduly removed from the pharmacy register
- Permit applicants to organise their own criminal history check with an appropriate body to minimise the bottleneck reported by AHPRA. In such circumstances, registration fees could also be appropriately discounted.
- Registration certificate/tax receipt to be sent at time of registration, not 4-6 weeks later
- AHPRA to inform pharmacists immediately when any paperwork discrepancy is identified e.g. form not completed
- Prior to removal from the pharmacy register, there must be appropriate notification and time allowed for pharmacists to rectify the situation
- Implement State based call centres as the national phone number has been unable to cope or provide answers to queries
- Improve response to email and phone queries
- Improve notification of registration due dates through pharmacy media and professional groups such as the Guild, Society of Hospital Pharmacists of Australia (SHPA) and the Pharmaceutical Society of Australia (PSA)
- Introduce wallet sized registration cards to replace current A4 certificate
- Introduce a quality assured complaint handling process that is separate from AHPRA

Correspondence from pharmacists

Email from [Pharmacist No.1](#) 2nd April 2011

Issues Raised: *Inefficient registration process, delays in registration process, inefficient administration, communication issues, removal from register notification, disciplinary/legal impact*

I sent my registration renewal in October and assumed all was well. On the first of February I received an email saying my registration had lapsed and I had till the end of the month to renew or I would be removed from the register. I phoned AHPRA who told me to check the web as this would say if I was registered. I had done this and was still on the register but with an expired date. They then told me to send in a fast renewal form with another payment which I did. Within a week my name was missing from the register completely. In late March I finally received confirmation that I am registered. This has caused me much distress.

Fax from Locum [Pharmacist No.2](#) 6th April 2011

Issues Raised: *Inefficient registration process, delays in registration process, communication issues, portability and availability of registration certificate*

I applied for renewal of Registration on the 17th December 2010. On January 4th 2011, not having received re-registration advice, I phone AHPRA to enquire re the application as I was leaving for a locum position in the country. I was advised the application had been received and would be processed in due course. I was advised that registration would automatically continue until the applications were actually processed at which date they would either be renewed or declined. When I said that the previous registration and the registration card that had been issued by the NSW Pharmacy Board specifically noted that registration was only until 31st December 2010, the reply was that the new legislation allowed for the registration to continue till such time as the renewal was considered. I requested and did receive an email to this effect.

I then received an email dated 22nd February 2011 advising that registration had been finalised and receipt and certificate would be forwarded in four to six weeks. This was received on 25th March 2011 – over fourteen weeks after the application was made for renewal.

On receipt of the receipt and certificate I was most disappointed to find that in both cases they were not suitable for carrying in one's wallet or purse. We believe and really expected that a card similar to previously issued (by the Pharmacy Board of NSW) as being ideal – but this was not to be.

And then the registration is only for eleven months and the fee had been raised from \$195 to \$245. No explanation was given as to why it was necessary to increase the registration fee by some 37%.

I feel there are some shortcomings with this new process. If it was possible for the NSW Pharmacy Board to receipt and return new registration cards within two days, why does it take over fourteen weeks for AHPRA to perform this same and not very difficult task.

Letter to AHPRA from Locum [Pharmacist No.1](#) & Locum [Pharmacist No.2](#) 2nd February 2011

Issues Raised: *Inefficient registration process, inefficient administration, portability and availability of registration certificate, legal impact*

More than six weeks have now elapsed since we made our applications for renewal of registration for the 2011 year and we have not received a card/certificate that our registration is current.

Your email of 4th January indicated our applications had been received and that we are registered. We seek your absolute assurance that our registration is in order as the 2010 registration cards made it quite clear that our registration expired on 31st December 2010.

Currently we find ourselves in the position of not having any current certification to present to an employer that we are in fact registered. This has the potential to present problems when being employed as a locum.

What is the position with insurance companies? Have companies such as PDL [Pharmaceutical Defence Limited] been advised of the persons who have been accepted for re-registration but not yet issued with personal confirmation?

We trust the delay will not continue as one would have thought that the issue of registration certificates/cards would have been quite a simple, straight forward exercise as happened previously with the NSW Pharmacy Board.

Fax from [Pharmacist No.3](#) 7th April 2011

Issues Raised: *Inefficient registration process, delays in registration process, communication issues*

- Posted registration renewal forms to AHPRA in early December 2010
- No communication from AHPRA until late March 2011- Forms returned to me with a cover letter pointing out I had omitted filling in the criminal history check section and that my payment had been accepted. These documents were stamped as received by AHPRA on 7th December 2010
- I have completed the section as required and sent to AHPRA at the end of March 2011
- Still waiting to hear back from AHPRA

Fax from [Pharmacist No.4](#) 6th April 2011

Issues Raised: *Inefficient registration process, delays in registration process, communication issues*

I am one of the many pharmacists who were completely frustrated by the inadequacy of AHPRA. Copies of my email enquiry and consequent emails follow.

As you are no doubt aware, the 1300 419 495 phone enquiry line was unavailable for enquiries during January 2011 and communication could only be made by the online enquiry email. Although the "customer service team" advised me on January 19th my enquiry would be escalated, I had no further communication from them until 18th February 2011.

In early February I eventually had an answer on the 1300 number and was put through to the NSW office and was told “yes” my application had been received and would be processed shortly.

Are we to go through the same thing again in December 2011?

Copies of emails sent to and from AHPRA:

18th January 2011 via Online Enquiry Form:

Registration application posted XXXX P.O. 6/12/2010. Phoned 1300 419 495 23/12/2010 and again 13/01/2011. Spoke to XXXX. She informed me I would have received an SMS or email if Pharmacy Board had not received my application-none received. Still currently listed as registered till 31/12/2010. Please confirm by email current status of my application As 31/01/2011 is fast approaching I am concerned about my status as a registered pharmacist

19th January 2011 Reply from AHPRA to Online enquiry

Dear Pharmacist 4,

Thank you for contacting AHPRA. Your enquiry has been escalated to an information/registration specialist who will advise you via email accordingly.

Regards

The Customer Service Team

AHPRA Enquiry Contact Centre

18th February 2011 Email from AHPRA

Dear Pharmacist 4.

This email is to advise you that your application to renew your registration has been finalised by AHPRA. You will receive a tax receipt and a certificate of registration from AHPRA within 4 to 6 weeks. In the meantime, if you need to confirm your registration status, you can search the public register at...etc

Email from [Pharmacist No.5](#) 4th April 2011

Issues Raised: *Communication issues, removal from register notification, disciplinary/legal impact*

In regards to AHPRA, last year I never received a renewal notice from them and then at the end of January my registration ran out. I was actually taken off the register list for a month without even knowing!!!

They never sent me a warning letter to let me know it will expire.

I was then sent a letter to say why they should not take disciplinary action against me because I let my registration expire.

Being a community pharmacist working 70 hours a week and a proprietor as well, can't they see why I would not want my registration to expire?!?!?

Not very happy with AHPRA.

Email from [Pharmacist No.6](#) 1st April 2011

Issues Raised: *Inefficiency of registration process, communication issues, portability and availability of registration certificate*

Firstly, can I say that the national system in my opinion was both unneeded and attempted to fix something that was not broken.

The state Pharmacy Board of NSW was both efficient and accessible.

Looking at the terms of reference, I find that (b) - the performance of the administration of AHPRA to be beyond appalling. On many occasions I tried to phone the customer service number and was unsuccessful. I cannot see how such an important organisation could be so un-contactable.

The second matter relates to the actual registration process and subsequent "certificate of registration", this document is both useless and renders itself to be lost, damaged and is not portable.....should a locum pharmacist "carry" it around with him/her? The system of issuing a card that one could store in their wallet or purse was both practical and logical.

In my experience AHPRA have been less than forthcoming with information, updates and registration paper work (a friend of mine is STILL waiting for his registration paperwork from last year!)

Email from [Pharmacist No.7](#) 2nd April 2011

Issues Raised: *Inefficient registration process, delays in registration process, administrative delays, communication issues*

My name is *Pharmacist No.7*. I forwarded my registration renewal in October 10. In February 11 I had received no response. When I checked the website my date registration date had expired. I filled out another application and paid again only to be contacted a few weeks later to say they had received my application in October 10 but were still processing it and now no longer required my second application. Then late March I was notified that my credit card payment was declined because the card date had expired at the end of February 2011. I was required to submit a new payment before my registration would be processed. My credit card was fine in October 2010, Nov, Dec, Jan and all of February but because of AHPRA's delay of more than four months in processing the payment when they finally did my card had expired. So for the third time I have sent in information to try to re-register. To date I still have no confirmation of registration. As the owner of a pharmacy this is unacceptable.

Email from [Pharmacist No.8](#) 1st April 2011

Issues Raised: *Delays in registration process, communication issues, inefficient administration, legal impact, complaint handling*

We experienced inconvenience as per the following:

My daughter *Pharmacist No.8.jr* and I – *Pharmacist No.8* tried to apply online for registration in November as our registration was due to expire end of December 2010. The system would not take our credit card details and when I phoned AHPRA they had no idea why and asked us to post the applications. - I have since heard that if one puts in the dates in an American format it would have taken the details but as I was not aware of this at the time I did not try that option.

Towards the end of December we had still not heard from AHPRA and phoned to ask what was going on. I was told to hold then told to contact another person in the department as the man on the switchboard could not help me. I refused to do this as I had already been on hold for almost half an hour and told him it was a waste of my time.

At the end of December I was very worried to see that my registration had not come through so phoned AHPRA again and was told that there were huge delays - they could not even tell me if they had received our applications in the mail and I told them that this was not very good service.

I phoned the PSA and spoke to a lovely man who told me that as long as my name still appeared as registered on the AHPRA website it meant that they were processing my application.

On 18th Feb 2011 AHPRA finally took payment for our registrations.

On 17th March 2011 we finally got our hard copy registrations.

This has to be the WORST government department I have ever dealt with and it caused me considerable angst to know that I was practicing without a hard copy registration certificate although I was assured that legally I was covered.

I was MUCH happier dealing with the NSW pharmacy board where I could always talk to a pharmacist and a knowledgeable person. I detest dealing with AHPRA as I have not even been able to talk to a pharmacist and I DISLIKE talking to persons who are not familiar with the system.

I have not had much success with AHPRA's complaint handling and was fobbed off by the man on the switchboard and there was no follow up or apologies from AHPRA and no adequate explanations.

I am happy for you to use this information.

Email from [Pharmacist No.9](#) 2nd April 2011

Issues Raised: *Inefficient registration process, delays in registration process, removal from register notification, legal impact, communication issues*

The main problem I experienced was the timeliness of getting my registration processed. I sent in my forms and payment in the last week of November 2010. In January when I checked my registration on-line I saw that I was not registered. I telephoned AHPRA and after waiting a considerable time was told that it was being reviewed and I would be given an extension on my registration of 4 weeks since I was late in registering. I knew I was not late but they didn't know why the delay. I finally received an email confirming that my registration was approved on the 20/2/2011, nearly 3 months after I sent it in.

Email from [Pharmacist No.10](#) 1st April 2011

Issues Raised: *Delays in registration process, communication issues, legal impact*

I have very bad experience with AHPRA, as pharmacy owner and pharmacist in charge for a small community pharmacy I didn't receive any documentation for confirmation of renewal of my registration till after more than a month of its expiry day. I mailed a cheque for them before the due date, I checked the website my name was not listed as having current registration, I tried to ring I was getting busy tone forever they never answered the phone not even having an answer machine to take a message, I started panicking about my legality to perform my tasks, I rang the pharmacy guild, the pharmaceutical society, the Pharmacy Board inspector that used to visit my pharmacy, no one could give me an answer.

I send emails to AHPRA I do not know how many because they were too many, they used to answer me with useless information e.g. your request will be processed in time, we going to respond to your query soon....etc. I kept asking them in my letters about the legality of running the business without valid registration till this minute they never answered this question.

After the extended extra month I was nearly having heart attack, I logged into the website and did electronic payment to have a receipt saying I am eligible for renewal of the registration. But what about my cheque that was mailed, I send few more emails asking directly what happened to my cheque after few days they send an email saying we received your payment they meant the electronic and never mentioned the cheque. At this stage I gave up.

But only last week or the week before they send the cheque back, Isn't this great performance.

Phone call from [Pharmacist No.11](#) 11th April 2011

Issues Raised: *Inefficient registration process, communication issues, removal from register notification, disciplinary/legal impact*

Pharmacist No.11 received a letter from the Pharmacy Council of NSW stating he had contravened Clause 5(1) Schedule 5F of the Health Practitioner National Law (NSW) and was asked to make a written submission. He was told that he had a pecuniary interest in a pharmacy business in NSW whilst being unregistered as a pharmacist.

Pharmacist No.11 noted that he had never received a notice for renewal of registration or any form of reminder notice from AHPRA. He received a letter from AHPRA on the 19th February 2011 (Dated 17th February 2011) notifying him that his name had been removed from the register of pharmacists. This was the first communication he had from AHPRA.

Upon receiving this letter he contacted AHPRA stating his concern and was offered the "Fast Track" registration process to restore his name to the register. He immediately agreed to do this. The process took approximately 10 days, during which time he felt it necessary to forgo working in his pharmacy until he received confirmation of his registration.

Pharmacist No.11 was especially concerned that while AHPRA was quick to notify the Pharmacy Council of NSW of his lapse of registration, he was not informed of his impending removal from the register until after it occurred.

Fax from Pharmacist No.12 5th April 2011

Issues Raised: *Inefficient registration processing, communication issues, removal from register notification, disciplinary/legal impact*

On 20/1/2011 I forwarded a cheque and registration renewal to AHPRA GPO Box 9958 Sydney, as requested and which was due on 30/1/2011.

On 16/2/2011 XXXX (AHPRA) wrote to me claiming I had not renewed my registration and it had lapsed. This was received on about the 20/2/2011 during my absence on holidays. My son XXXX (a registered pharmacist) contacted AHPRA to check his own status, which was current, and then enquired about my registration. After a lengthy delay on the phone, he was told my registration was “in the system” and my registration was “OK”.

On 10/3/2011 I received a letter from XXXX, (Pharmacy Council of NSW), stating I had contravened Clause 5(1) Schedule 5F of the Health Practitioner Regulation National Law (NSW) and I was requested to respond by COB 4/4/2011. Failure to make a written submission may result in an Inquiry.

On 10/3/2011 I rang AHPRA and spoke to XXXX, general enquiries in Melbourne, after a lengthy explanation I was transferred to XXXX in Sydney who confirmed my payment had been received on time but my status was incorrect. She finally agreed that AHPRA had made a mistake but she had no authority to restore my registration and there was no person who had the authority to do so. She asked me to leave a message on XXXX's voice mail, which I did, but I also stressed the urgency of the situation and asked XXXX to confirm XXXX received my message.

On 15th March I sent a fax to the Pharmacy Council of NSW, in which I asked to please confirm receipt of the fax and to advise if the fax complies with the written submission request as per the letter from XXXX. As of today, 2/4/2011, I have not received confirmation of receipt of the fax or if it complied with the written submission request.

On 18/3/2011 XXXX rang me. He confirmed the AHPRA error and that I had been registered since 1/1/2011. He stated that he would contact the Pharmacy Council of NSW and advise them of my situation and confirm the matter was now settled.

I have not received any further written or verbal contact either from AHPRA or the Pharmacy Council of NSW. I consider such treatment as totally inefficient and unacceptable. Despite the critical need to be registered to continue to practice legally, I consider AHPRA the most incompetent and arrogant lot I have ever been associated with, even in the short time they have been operating.