

## CONSULTATION DOCUMENT

### Proposed Written Examination Fee

**Released: Wednesday 1 November 2017**  
**Submissions due: Friday 1 December 2017**

#### 1. Purpose

The purpose of this consultation is to seek pharmacists' and stakeholders' views on the proposed fees for the Written Examination. Responses will be considered by Council before a final decision is made.

#### 2. Who we are

The Pharmacy Council of New Zealand (the Council) is established under the Health Practitioners Competence Assurance Act 2003 (HPCAA) and has a duty to protect the public and promote good pharmacist practice. The Council is responsible for the registration of pharmacists, the setting of standards for pharmacists' education, scopes of practice and conduct. The Council's vision is to promote enhanced wellbeing through excellence in pharmacy practice.

#### 3. Background

Council is committed to ensuring pharmacists are skilled, educated and qualified to practise safely within current models of practice and are prepared for evolving models of care.

The following groups must complete the New Zealand Intern Training Programme (ITP) and pass Council assessments whilst registered in the Intern Pharmacist scope of practice:

- New Zealand and Australian graduates of an accredited Bachelor of Pharmacy programme.
- Applications for Pharmacy registration via the Non-Recognised Equivalent Qualifications Route (those with a pharmacy qualification from a country other than Australia, Canada, Ireland, the UK or the USA).
- Applicants wishing to return to practice having been previously registered in New Zealand but are no longer on the Council's register.

The ITP, the Written Examination and the Assessment Centre are prescribed qualifications for registration in the Pharmacist scope of practice.

The purpose of the Written Examination is to assess the clinical knowledge and the application of that clinical knowledge. It tests candidates' knowledge of legislation, health management, the supply and administration of medicines and calculations. The Written Examination is a computer-delivered three-hour open book exam consisting of 125 questions.

The Written Examination takes place three times a year: March, July and September. Candidates can undertake the exam in Auckland, Christchurch or Wellington.

The Written Examination is managed and delivered on behalf of Council by the Australian Pharmacy Council and their partner organisation, Pearson VUE.

The fee for the Written Examination has been \$520 (inclusive of GST) since December 2013 (New Zealand Gazette, 12 December 2013, Issue No. 167, Notice No. 2013-gs7845).

#### **4. Proposal and rationale**

Council proposes the new Written Examination fee to be \$973.51 plus \$146.02 GST, totalling \$1,119.53 (inclusive of GST) per attempt. Please note, this fee excludes credit/debit card fees of 2%. The Written Examination fee will be reviewed by Council each year.

The fee has been calculated on a cost recovery basis in order to offset internal and external costs incurred to manage the examination. This cost recovery model has no cross-subsidisation with other Council activity or fees.

The external costs are from Council's partner organisation for exam delivery, Australian Pharmacy Council, which include the following:

- Generating the examination questions and the complete Written Examination papers.
- Reviewing the Written Examination format and functionality accuracy in the IT system prior to examination publication.
- Coordinating the examination registration.
- Liaising and managing a third-party provider to deliver the exam on the day, including organising the venues, invigilation, special accommodation for students needing extra time and incident reporting.
- Issuing the examination results to Council.

The internal costs incurred by Council include the following:

- Contracting a group of independent pharmacists to scrutinise the exam questions to ensure they are accurate to New Zealand pharmacy practice and are fair to interns for their level of knowledge at the stage of their professional life.
- Salary of the Assessment & Examinations Manager to administer the applications for the Written Examination, to provide communication to candidates, including notification of their results, and to oversee the development of each Written Examination.
- A proportion of Council's overhead costs.

All three Written Examinations over the course of the year have a different set of questions and a different group of candidates. Having a different set of questions for each exam ensures that past candidates do not inform future candidates of the questions they should expect. Secondly, this ensures that candidates re-taking the exam do not answer the same questions they previously answered. Due to these factors, the management and development of each Written Examination is separate, thereby increasing the robustness of the exam as well as the expense of it.

Both the external and internal cost-incurring activities and services are necessary to ensure the Written Examination continues to meet Council's requirement of the prescribed qualifications and sets a high standard for future pharmacists to ensure public safety.

Costs within Council's control have been fully scrutinised to ensure Council is proposing an efficient fee for the Written Examination.

Council acknowledges a significant increase to the examination fee. However, expenses outside Council's control such as those charged by our partner organisation have been increasing year on year without corresponding increases in the fees charged to candidates.

Without a fee increase, Council will be in the unsustainable position of continuing to subsidise the cost of the Written Examination from other regulatory activities. Council prefers that examination costs are fully recovered from examination fees. This approach is consistent with that of the good practice guidelines established by both the Office of the Auditor General and the Treasury.

## **5. Written Examination Fee and the Annual Practising Certificate Fee**

Council is concurrently consulting on this proposed Written Examination fee, as well as a proposed fee for the Annual Practising Certificate. The responses to the two consultations will be considered together.

## **6. Summary**

Council proposes a Written Examination fee of \$1,119.53 (inclusive of GST) to ensure all costs it incurs in managing this prescribed qualification are covered.

## **7. How to submit a response**

Responses can be sent:

### **by email**

Please click [here](#) to download the submission form and email it to:

[consultations@pharmacycouncil.org.nz](mailto:consultations@pharmacycouncil.org.nz)

Please make your subject line: 'Consultation, Written Examination Fee', or if you would like to make a joint submission for both fees, please make your subject line: 'Consultation, Written Examination Fee and Annual Practising Certificate Fee'.

Please include details in your response including your name, your role and which organisation or health sector you represent.

**through our online survey which can be accessed [here](#)**

**by mail**

Please click [here](#) to download the submission form and post it to:  
Consultation, Written Examination Fee *or* Consultation, Written Examination Fee and  
Annual Practising Certificate Fee  
Pharmacy Council of New Zealand  
PO Box 25137  
Wellington 6146

Please include details in your response including your name, your role and which organisation or health sector you represent.

**Council invites feedback on the proposal by 5pm on Friday 1 December 2017**

Kind regards

Michael A Pead  
**Chief Executive**