



SUBMISSION

STANDARD OF PRACTICE IN PHARMACY INFORMATICS

- **Society of Hospital Pharmacists of Australia (SHPA)**

NOVEMBER 2023

The Australasian Institute of Digital Health (AIDH) is pleased to provide a response to the Society of Hospital Pharmacists draft on Standard of Practice in Pharmacy Informatics. We note the contribution to ongoing workforce development and capability in and across healthcare as the use of digital systems, technologies, and data become increasingly relevant.

The Australasian Institute of Digital Health (AIDH) is the peak professional body for digital health, representing a united and influential voice for health informatics and digital health leaders and practitioners working across all aspects of the healthcare sector. The AIDH has a rapidly growing membership of professionals comprising doctors, health informaticians, nurses, midwives, allied health, other clinicians, administrators, and health technology business leaders.

The AIDH provides objective, non-partisan, and independent advice on health informatics and the digital enablement of healthcare to not only improve the health outcomes of Australians, but to solve our healthcare system's most pressing challenges. The Institute's vision is healthier lives, digitally enabled. Our priority areas are leadership and advocacy, workforce advancement and community engagement.

The AIDH's unique composition and reach brings together an extensive network of Australia's leading digital health experts across the private, public and community sectors to advance our nation's transition to a digital health future.

General Comments

AIDH supports the Society of Hospital Pharmacists Australia (SHPA) in its proactive leadership in recognising specific and specialty skills in health informatics as they relate to pharmacy professionals. The AIDH whilst supportive would appreciate SHPA considering the following.

AIDH sought input from over 30 key members and stakeholders including Fellows, CHIA certified informatics professionals, pharmacy informatics leaders in our network, and educators. Several individuals declined to participate in that were already involved in the work or were not able to provide any further input. Collated feedback includes comments from our respondents as well as AIDH leadership.

Professionalism in digital health and informatics is still evolving. We need to recognise the unique skill set and knowledge that these individuals bring to the operation and ongoing transformation of the health sector. AIDH supports efforts to highlight these important areas and the individuals that work in this space. Formalisation of roles and titles in hospitals and health services is a good step, but as the standard highlights we need consistency in understanding and expectations of those roles and the knowledge and skills required, as well as career pathways to attract and retain people to those roles. This could then be aligned next to formal post graduate training in digital health, undertaking the Certified Health Informatician Australasia (CHIA) industry certification, and alignment with future Fellowship programs such as the Clinical Informatics Fellowship.

Clinical Informatics Fellowship – over 2022/23 the AIDH worked with the Digital Health CRC and a cross section of clinical leadership stakeholders on designing a Clinical Informatics Fellowship. The Fellowship is intended to provide a formal program which recognises clinicians (including pharmacists) for their knowledge and skills in informatics, as well as being endorsed by their professional college. The intent of the Fellowship is to support professionalism in clinical informatics, provide career options for individuals, and receive acknowledgement for the profession/s of those skills as a specialty area. The Fellowship could support standards and career pathways in pharmacy informatics.

Alignment to the Australian Health Informatics Competency Framework (AHICF)¹ which is published by the AIDH as a framework to guide competency in health informatics. Health informatics and digital health is a broad field with different professional focuses and nuances, such as pharmacy, medical, nursing, allied health etc. AIDH acknowledges the reference to the AHICF, and the need for consistency across the areas with common understanding and application. The AIDH would be pleased to assist with any mapping or drafting of capability statements aligned to the standard to achieve greater consistency if required. We have members and contributors to this response that would be happy to assist.

Specific Feedback Comments

- AI should be defined and referenced much more extensively particularly regarding governance of training and deployed datasets for medications management and clinical decision making and alerts. This is important to avoid the standard looking dated on publication.

¹ <https://digitalhealth.org.au/wp-content/uploads/2022/06/AHICFCompetencyFramework.pdf>

- Re Lines 226 – 228, we recommend defining CLMM e.g., Closed-loop medications management (CLMM) is a system that uses technology to automate the entire medication management process, from ordering and dispensing to administration and monitoring. This can help to improve patient safety, reduce costs, and increase efficiency. CLMM systems typically use a combination of barcode scanning, electronic health records (EHRs), and automated dispensing cabinets (ADCs) to track medications throughout the entire process.
- Re Line 232, it seems overstated to say, "unique ability". We suggest replacing it with: "Pharmacy informaticians are particularly qualified to identify".
- Re Lines 235 to 240, we would have expected some commentary on role of pharmacy informaticians in clinical governance of use of AI in healthcare related to medications, oversight of application of AI and to ensure minimisation of biases and safe workflow integration.
- Re Lines 260 and 261, similarly governance of AI should be added as related to medications and to ensure minimisation of biases and safe workflow integration.
- Re Line 267, "Digital maturity" should be defined e.g., digital maturity in healthcare settings is the extent to which a healthcare organization has adopted and integrated digital technologies into its operations and services. It is a measure of how well the organisation is using digital technologies to improve patient care, reduce costs, and increase efficiency.
- Re Line 284, we recommend adding something on AI such as: "Participation in safe, transparent and fair governance of AI as related to use of medications."
- Re Line 296 In the table rubric provided, the governance of AI as it pertains to safe, transparent, and fair use of medications-related datasets including for training and deployment - this aspect is very important and is currently under-represented in this document. We recommend adjusting the rubric to highlight this aspect.
- Re Line 391, please add certified by...Australasian Institute of Digital Health – followed by CHIA certification.
- Re Line 316 AI bias is well highlighted in Figure 1 - this is well done. However, this is the first reference to AI which is a major issue of the document given the inescapable impact it is having and going to have on pharmacy.
- Re Line 406 HIMSS APAC Conference to replace "HIMSS Summit" as this is the right name for their regional event.
- Re Line 524, Table 2 - the indicators should highlight some involvement in governance processes or committees for those overseeing data intended for use of AI in medications management or clinical decision systems.
- From a capability development perspective and not pharmacy informatics specifically:
 - Suggest statements need revising regarding the stems they are using. For example, saying understand "x, y, z", but then provide examples that are at the Apply or Analysing domain for Blooms Taxonomy. We would encourage developing capability statements further in line with above to enhance the work.

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