

APOLOGETIC FOR HARMONIZING STANDARDS FOR STUDENTS EDUCATED IN INTERNATIONAL, NON-ACCREDITED PROGRAMS OF PHARMACY WITH EXISTING ACCREDITATION COUNCIL FOR PHARMACY EDUCATION STANDARDS AND BOARDS OF PHARMACY REQUIREMENTS

Let us begin with the premise that the regulation of professional practice is a purview of the state. Each state gets to decide the qualifications for entry level pharmacy practice standards for professionals serving the people of that state.

States have worked over the course of many years to standardize these requirements and processes, when it is perceived by them to be in their best interest. Every state wants competent professionals providing, in our case, pharmacy services to their citizens.

Ease of movement from one state to another for the professionals licensed within the state, is also a consideration. This consideration extends to importing qualified professionals to serve the state, as well as the desire of some professionals to go else where.

There are also significant considerations involved in the expense, time and expertise necessary to determine which educational programs should and would qualify for entry level into practice in our respective state. To this end, we have created the Accreditation Council for Pharmacy Education (ACPE) through a cooperative effort by most of us, if not all of us, to bear this burden of accreditation. We then state in our Laws and Rules that we will accept graduates of programs accredited by ACPE.

When it comes to accepting graduates from schools which have not been accredited by ACPE the problem gets somewhat more complicated. To this end, we created the National Association of Boards of Pharmacy (NABP), to serve our purposes in providing expertise in examinations, as well as facilitating the movement of licensees across state lines.

As is always the case, we need to establish a starting point for anyone seeking licensure. This starting point has historically been an ACPE Accredited Program, or a foreign program meeting a certain level of minimum training, which has been prior to 2004, a four-year pharmacy program and subsequent to July 1, 2004, a five-year pharmacy program. To this is then added the required internship in the specific state, as well as successful completion of a Foreign Pharmacy Graduate Equivalency Examination administered through NABP or one of its contractors. This examination gives us the confidence that the individual seeking licensure has an equivalent didactic education to that found in an entry level graduate from an ACPE Accredited Program.

We are here today because not all states have adopted a consistent requirement for eligibility to sit for the Foreign Pharmacy Graduate Equivalency Examination or subsequently for the NAPLEX Examination.

Let us step back for a moment to North Dakota as an example. In North Dakota we have always tried to be as friendly as possible to foreign graduates. For example, we do not have a citizenship requirement. We do not require the individual to be a resident of North Dakota, a citizen of North Dakota nor a citizen of the United States. We simply require them to be competent to practice pharmacy and be able to communicate with the citizens of North Dakota in English. Even though many of our citizens are Germans from Russia, Norwegians and I am told, one-hundred and thirteen languages spoken in Fargo, North Dakota. This is thanks in part to the work of Lutheran Social Services in bringing a broad array of immigrants to our state. We still require English.

After 2004, we continued to have many applicants seeking licensure who have graduated from only a four-year program in their home country. We told them that the alternative for them was to obtain a PharmD Degree, which is now the accepted entry

level degree for graduates in this country, from an ACPE Accredited educational institution. There are several institutions around the country who maintain what is sometimes termed an add-on PharmD Degree. This could be for an old pharmacist, like me, who graduated with a BS Pharmacy Degree, and now seeks our PharmD Degree, either to compete in the market place or simply to learn additional skills. Others have a degree from a foreign country which does not make them eligible to sit for the Foreign Pharmacy Graduate Equivalency Examination.

The following is a description, from Dr Miller of one such program, which is offered by North Dakota State University (NDSU) and termed a post-baccalaureate PharmD Degree: *****

Donald Miller, Pharm.D., Professor and Chair,
Pharmacy Practice Department (Dept 2660)
College of Pharmacy, Nursing & Allied Sciences NDSU
Fargo, ND 58108-6050
701-231-7941

North Dakota State University has offered a post-baccalaureate Pharm.D. Program since about 1985. It was originally targeted to a select (4 to 6 students/class) group of B.S. graduates who wanted to provide advanced clinical pharmacy services, and the program had a strong focus on pharmacotherapy classes. It was a two-year program with one year of coursework and 40 weeks of advanced clinical rotations. In 1990 we converted our B.S. degree to an entry-level Pharm.D. program, and the entry-level curriculum contained most of the courses from the post-baccalaureate program, including the full pharmacotherapy sequence.

Once our entry-level Pharm.D. Program was implemented we continued the post-baccalaureate program on the assumption that some of our baccalaureate graduates would still wish to pursue a Pharm.D. Degree, and indeed we had a few students enroll. Post-baccalaureate students were "mainstreamed" into all the classes for the entry-level students, since the post-baccalaureate program was really a subset of the full entry-level curriculum.

In the mid to late 1990s we had an application from a South Korean student who had a B.S. in pharmacy from South Korea. We accepted her application with some trepidation, not knowing if she could handle the rigorous Pharm.D. coursework. To our pleasant surprise, she was an outstanding student who did well in all her classes. We then continued to get applications from foreign graduates, and accepted them (up to 3/year) if their transcripts indicated high grades with a solid educational background. We ensure the quality of these students by insisting they have the prerequisite courses (especially pharmacology) to jump into our program. If they are missing important prerequisite courses they are not admitted. We have accepted students from South Korea, Saudi Arabia, India, Nigeria, and China. With perhaps one or two exceptions, each international student has been an excellent student in our curriculum.

Over time, our entry-level curriculum changed so that post-baccalaureate students needed to complete the necessary coursework over 2 years, instead of one, before they completed 30 weeks of advanced practice rotations. However, we never compromised the post-baccalaureate program, or allowed students to take any short-cuts. The post-baccalaureate program actually became more rigorous over time, as we made sure the international students took required classes in pharmacy law, and the pharmacy practice laboratory. ACPE accreditation visits in 1999 and 2006 agreed that our post-baccalaureate students achieved all the same outcomes as entry-level students.

In summary, our post-baccalaureate curriculum has always been designed with practice competence in mind, and has been limited to 3 students per year. We have continued to admit international students into the program because of the diversity it creates in our student body, not for any financial gain. The last thing we have ever wanted was poorly prepared graduates that could reflect badly on NDSU. We are proud of our international post-baccalaureate graduates and will put them side by side with any entry-level graduate from any school of pharmacy. *****

As you can see, North Dakota has left it to the Accredited Colleges of Pharmacy to determine the prerequisites for entry into their post-baccalaureate PharmD Degree program. Much like transferring credits from a Junior College into a Pharmacy Program or transferring credits from one College of Pharmacy Program to another is left to the accredited educational institution. We have left the determination of these prerequisites to them as well.

It has been our opinion that once a student received their PharmD Degree from one of these accredited institutions, regardless of whether they had received their entry level credits from several different institutions within this country or various institutions around the world, they are now eligible to sit for the NAPLEX, *IF* they have the necessary internship hours required by our state.

In summary, if we feel that our accredited colleges of pharmacy are not doing a good job in selecting students and graduating them with a degree making them ready to practice the profession of Pharmacy, we ought to address that deficiency with the accrediting agency, the institutions themselves, or perhaps both. To set yet varying standards once the student has achieved the PharmD Degree, seems like a giant step backwards, to the time when we did not have an ACPE or an NABP to assist us.

Howard C. Anderson, Jr, R.Ph.
Executive Director
North Dakota State Board of Pharmacy