



POLICY

Exceptional Circumstances Policy

Purpose

The purpose of this policy is to support Rules 7 and 28 and describe those circumstances under which an application for extension or permanent change will be considered to a remedial action required or reaccreditation date.

Application

Any application for extension or permanent date change must be made prior to the corrective action due date or reaccreditation date. All pharmacies should be ready to be assessed under the program at any point, and therefore variations to the confirmed assessment date can only be granted in exceptional circumstances.

Exceptional circumstances are considered to be unavoidable or unforeseen events that have an immediate impact in the pharmacy's ability to deliver regular services and where the pharmacy has done all reasonable action to mitigate impact to maintain their reaccreditation (out of the pharmacy's control).

Examples of exceptional circumstances may include, but are not limited to:

- recent burglary or severe unexpected damage to premise e.g. fire, flood.
- bereavement of immediate family member
- unforeseen significant medical emergencies
- natural disasters.

Consideration may also be provided where the pharmacy is moving location or a sale of a pharmacy, depending on impact to business operations.

Reasonable requests for additional time which are not considered exceptional circumstances will be considered based on resources available at the time.

All applications should include the provision of detailed information and evidence to support the request.

1. Reaccreditation extension

As per Rule 7, a pharmacy may request a reaccreditation extension of no more than three calendar months to allow QCPP Assessment to occur after the pharmacy's reaccreditation date. This request must be received prior to the pharmacy's existing reaccreditation date. The request will only be granted in exceptional circumstances.





| Scenario | Result |
|--|--|
| Change requested due to exceptional circumstances | Assessment rebooked without charge. |
| Change requested due to reasons outside pharmacy's control, but which are not exceptional circumstances | Assessment may be rebooked, subject to QCPP operational requirements, including assessor availability. |
| Change requested due to pharmacy not being ready for assessment | Assessment unable to be rebooked. Cancellation policy may apply. |

QCPP may unilaterally extend a pharmacy's reaccreditation date to meet program operational needs e.g. to improve travel efficiencies.

2. Corrective action extension

As per Rule 28, a pharmacy may request a corrective action extension of no more than three months (to a maximum of six months from the interim report date) to allow more time to address Remedial Action Required (RAR) identified at QCPP Assessment.

Requests for extensions will be considered as follows:

| Scenario | Result |
|--|--|
| Extension requested due to exceptional circumstances | Extension will be granted |
| Extension requested due to reasonable reasons outside pharmacy's control, but which are not exceptional circumstances | Extension may be granted, provided pharmacy demonstrates ongoing attempts to resolve issue |
| Extension requested where exceptional circumstances do not apply, and the pharmacy has not made reasonably attempts to resolve issue prior to request | Extension will not be granted |

In instances where a pharmacy is undergoing the Corrective Action Review Request process an extension may be applied at the sole discretion of QCPP to accommodate this.

Due to the higher risk associated with Non-Conformances (NC) there is no facility to apply for extension to complete a NC.





3. Permanent accreditation date change

Where a pharmacy has identified that their accreditation date is consistently problematic for them to accommodate the QCPP assessment they can apply for a permanent accreditation date change. QCPP will consider these applications on a case-by-case basis, considering operational requirements.

Where possible QCPP will endeavour to find a mutually agreeable date with the pharmacy.

The accreditation date may also be unilaterally changed by QCPP, provided it does not negatively impact the pharmacy.

4. Sanction extensions

Where extenuating circumstances exist, a pharmacy may request more time to complete a sanction. Where public safety is not a risk as a result of the sanction, the extension request will be considered against the criteria for *Corrective Action Extensions* (above).

Where sanctions relate to public safety concerns, QCPP will only consider extensions where it is demonstrated this safety risk has been mitigated.

5. Appealable decisions

Extension request outcomes are appealable decisions, consistent with QCPP Rule 46 and the *Natural Justice Policy*.

Related rules, terms and policies

Natural Justice Policy – Corrective Action Review Request

Sanctions Policy

Program Rule 3

Program Rule 7

Program Rule 43

Program Rule 46

Service Agreement: Terms and Conditions

