



27 July 2021

7CPA Pharmacy Programs Team  
Pharmacy Branch, Technology Assessment and Access Division  
Australian Government Department of Health  
PO Box 9848, Canberra ACT 2601  
Email: [medication.management@health.gov.au](mailto:medication.management@health.gov.au)

Dear 7CPA Pharmacy Programs Team

**RE: Draft consent forms and proposed Frequently Asked Questions for Dose Administration Aids in the new Commonwealth Programs**

The Society of Hospital Pharmacists of Australia is the national professional organisation for more than 5,200 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is committed to facilitating the safe and effective use of medicines, which is the core business of pharmacists, especially in hospitals and health clinics.

SHPA has more than 650 pharmacists engaged in our Aboriginal and Torres Strait Islander Health and Rural and Remote Specialty Practice pharmacy streams, working in hospitals and health service facilities, and with Indigenous communities nationally. Hospital pharmacists, particularly those practicing in rural and remote settings, are often involved in the provision of DAAs to patients.

SHPA thanks the Department for being given the opportunity to respond to previous rounds of stakeholder consultation on the Indigenous Dose Administration Aids (DAA) program in 2020, and for sending through draft final program rules and factsheets for medical practitioners and other healthcare providers earlier this year which we have shared with the SHPA membership.

SHPA has recently been made aware of a brief Commonwealth consultation on draft consent forms and a proposed frequently asked questions document for the Indigenous DAA program and would like an opportunity to provide comments on these draft documents.

SHPA members who have reviewed these documents have raised concerns that the content, whilst understanding there is a need to be technical, should be written at a health literacy level that is appropriate and easy to understand for the target audience.

Furthermore, members also have concerns that the consent forms lack clarity and require further work to ensure health professionals utilising these forms can themselves understand and aid patients in understanding the consent being obtained.

SHPA would support a broader consultation of these documents with pharmacy peak bodies, consumer groups, and Indigenous primary care givers, similar to earlier rounds of consultation last year, to ensure the final drafts are fit-for-purpose.

If you have any queries or would like to discuss our letter further, please do not hesitate to contact Jerry Yik, Head of Policy and Advocacy on [jyik@sphpa.org.au](mailto:jyik@sphpa.org.au).

Yours sincerely,

Kristin Michaels  
Chief Executive

Aleena Williams  
Chair of SHPA Aboriginal and Torres Strait Islander Health Leadership Committee



**The Society of Hospital Pharmacists of Australia**

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