



Health Care Consumers' Association Inc
100 Maitland Street HACKETT ACT2602
Phone: 02 6230 7800 Fax: 02 6230 7833
Email: adminofficer@hcca.org.au
ABN: 59 698 548 902

HCCA Submission to the Consultation on Options for Controlled Medicines Prescribing in ACT

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The Health Care Consumers' Association (HCCA) of the ACT was formed over 30 years ago to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision making.

HCCA welcomes the opportunity to provide input to the Consultation on Options for Controlled Medicines Prescribing in the ACT. We acknowledge this discussion paper is driven by the recognition that the bureaucratic processes relating to controlled medicines prescribing are onerous and do not necessarily achieve the objectives of the MPTG Act and Regulations.

Consumers' priority is to achieve quality use of medicines through ensuring appropriate access to the appropriate treatment (whether or not it is a medicine) for the appropriate condition. This is not always the outcome, under the current arrangements. Public health risk must be balanced with ensuring appropriate access for appropriate patients.

HCCA supports the favoured **Option #3 – Issue standing approval to all prescribers** because it recognises the difficulty of auditing or monitoring prescriber compliance. If this option is adopted, control will still be *post facto* at best, therefore will require additional monitoring and evaluation. We do not favour Option 4 because it adds, rather than reduces, complexity.

HCCA also favours the **expansion of the Medicines Advisory Committee (MAC)** and a change in its functions. A Committee consisting of all relevant stakeholders will be better placed to advise the Chief Pharmacist on which substances should be controlled and the suitable level of that control. They would also be able to take into account the realities of practice, the issues of access for patients, the availability of specified prescribers and services, as well as the public health risks. Therefore, the Guidelines for prescribing controlled substances will take into account both the social and clinical circumstances of each patient.

Currently there are genuine access issues related to the specification of particular substances and the limitation on approved prescribers. For example:

- Short limits on prescriptions for people with ongoing chronic pain for whom consistency of medication is important;
- Restriction to specific prescriber specialties for adult ADHD patients (not applied elsewhere in Australia). This is onerous for consumers, as suitable prescribers are not available in the public system
- Management of recognised drug users receiving pharmacotherapy for addiction

Real time monitoring through dispensing data will enhance safety and provide quality control and planning information. A properly constituted MAC should have a role in advising on the analysis and use of the data. This could include:

- “red flag” monitoring of poor prescribing practices and timely intervention through counseling or intervention
- identifying dispensing patterns as a surrogate for community use. This can inform planning of appropriate local education and public health strategies
- evaluating the data against relevant services to inform broader service planning. For instance, the discussion paper highlights significant increase in pain medications but does not consider this against the very limited availability of alternative pain management resources.

HCCA also supports the points raised in the submissions by Pain Support ACT and the Canberra Alliance for Harm Minimisation and Advocacy (CAHMA). CAHMA raises the, very valid, concern that members of the community who have previously been identified as drug users, have difficulty accessing Schedule A pain medications in the future. This is a significant access issue, because it is vital that consumers can obtain the treatments they require without discrimination.

In **Summary** HCCA welcomes the discussion paper and supports:

- Option 3 – Issue standing approval to all prescribers
- Broadening the membership of MAC
- real time reporting from pharmacies

And in addition urges

- An expanded role for the MAC to consider public risk issues in the context of quality use of medicines principles.

Please do not hesitate to contact us if you wish to discuss our submission further.

Health Care Consumers' Association of the ACT