

Operational Policy & Legacy Programmes Section
Pharmaceutical Benefits Branch
Department of Human Services
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To whom it may concern

Re: PBS/RPBS Stationery Product Review

The Australian College of Nursing (ACN) welcomes the opportunity to provide feedback on the *PBS/RPBS Stationery Product Review* proposing to amalgamate six prescription pads into one product for all eligible prescribers (V1.3 – April 2019). As the pre-eminent and national leader of the nursing profession, ACN represents nurse practitioners who are eligible prescribers as described in this consultation. ACN is interested in the outcome of this review, given the proposed changes to prescription pads directly impacts members of the nursing profession.

ACN believes there are benefits in amalgamating the six prescription pads, particularly from the Department of Human Services perspective around ordering and supply. However the changes are more likely to impact prescribers (i.e. theft of non-personalised prescription pads) and pharmacists who will be processing these prescriptions. Below is a list of comments provided by ACN on the proposed changes:

- ***Proposed Change 1: Amalgamating six prescription pads into one product that can be used by all eligible prescriber types***

ACN notes that for prescribers who do not currently use equipment or prescribing software to generate computer prescriptions, their prescription pads are differently coloured depending on the prescriber type (e.g. nurse practitioner, GP, dentist etc.) and form type (e.g. authority form). This colour scheme allows pharmacists to easily identify where the prescription came from during the dispensing of medication process. ACN would suggest that in the new script pad, the tick boxes required for each eligible prescriber to fill are coloured similarly. ACN notes that for computer-generated forms of the new script pad, this option is not feasible unless printing in colour.

- ***Proposed change 2: Remove pre-printed prescriber details.***

ACN believes prescribers who work across multiple locations will benefit from non pre-printed prescription pads. However ACN notes there are potential risks associated with non-personalised prescription pads. Theft of prescription pads by non-authorized persons to prescribe medicines (particularly S8 and S4D class medications) for personal use have been reported previously. Pre-printed personalised details which include an approval/PBS prescriber number offers pharmacists a greater deal of certainty around the legitimacy of the prescription.

In regard to the implementation timeframe:

- The time frame for implementation is supported, however, to prevent confusion in the community ACN suggests an end date is highlighted for the old prescription pads being accepted. Old prescription pads should be destroyed following the end date.

In summary, ACN would support the five changes to the PBS/RPBS standard prescription pads

- I. All eligible prescribers on one pad recognises the workforce that can prescribe. Also they are aware of their prescriber rights.
- II. Removing pre-printed names reduces the turnaround time for printing pads and enables clinicians working in different locations to have just one pad instead of multiple pads for different locations.
- III. Authority scripts are clearly identifiable so supported.
- IV. As III
- V. Reducing ordering requirements is supported.

ACN looks forward to hearing of the outcome of this review.

If you have further enquiries regarding this matter, please contact Dr Carolyn Stapleton, Manager - Policy and Advocacy, at carolyn.stapleton@acn.edu.au.

Yours sincerely



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