5 March 2021

Dr Kerryn Coleman
ACT Chief Health Officer
ACT Health
Locked Bag 5005
Weston Creek   ACT   2611
Via email: ACTHealthOCHO@act.gov.au

Dear Dr Coleman,

RE: ACT Health Real Time Notifications and Alerts

The Society of Hospital Pharmacists of Australia (SHPA) is the national organisation for more than 5,200 leading pharmacists and pharmacy technicians working across Australia's health system, advocating for improved safety and quality of medicines use. SHPA members lead the majority of pharmacy departments in ACT public and private hospitals. SHPA is aware of the public health issues arising from abuse and misuse of controlled medicines and is committed to supporting any measures implemented to reduce patient harm including, in principle, the implementation of a nationally consistent Real Time Prescription Monitoring (RTPM) system.

The SHPA ACT Branch Committee supports in principle the implementation of a nationwide RTPM system said to replace ACT's current monitoring system DAPIS Online Remote Access (DORA). The committee supports the proposed National Data Exchange (NDE) practitioner real-time 'traffic light' notifications, and the majority of the proposed patient alerts.

Minimise unnecessary alerts to reduce alert fatigue

The SHPA ACT Branch Committee notes that Chief Health Officer (CHO) Approvals are not required in the hospital setting and therefore, some of the proposed ACT Specific Alerts, namely the 'Prescriber Not Authorised Alert' and the 'CHO Approval Expiring Alert', are not relevant to prescribers and pharmacists caring for patients in this setting. The CHO approvals are not required in the inpatient hospital setting as the risks of 'doctor shopping' and diversion of controlled drugs by patients, which is what the RTPM also seeks to address, is mitigated and drastically reduced in the hospital setting.

The committee is concerned that hospital prescribers and pharmacists may experience 'alert fatigue' given the nature of medications routinely prescribed and dispensed to people who are acutely unwell in hospitals, are likely to trigger one or more alerts. Therefore, to minimise the likelihood of 'alert fatigue' and minimise confusion of longstanding regulatory practice around these medicines in the hospital setting, the SHPA ACT Branch Committee recommends that alerts relating to CHO Approvals, are not displayed in the hospital setting.

Full integration with hospital pharmacy software must precede requirement for mandatory use

The SHPA ACT Branch Committee is seeking clarity on whether ACT Health would require mandatory use of the RTPM system. The committee would in principle support mandatory use by prescribers and pharmacists but would not support the immediate introduction of this requirement into the hospital setting.

The public hospitals face barriers to adoption of RTPM that do not exist in the General Practice and Community Pharmacy setting, particularly relating to integration with ICT systems used in public hospitals.

The SHPA ACT Branch would like to seek clarification that the Merlin pharmacy dispensing system, Epic Digital Health Record and iDose opioid management system will all integrate with the Prescription Exchange Service (PES).

Monitoring exemption for inpatient medication charting, supply and administration

The SHPA ACT Branch, notes that inpatient charting, supply and administration of monitored medicines is exempt from recording in Victoria's RTPM system (SafeScript) and seeks assurance that this exemption will be applied in the ACT hospitals. Inpatient medication charting and administration does not involve formal 'prescribing' or 'dispensing' actions under the Poisons Act but is often referred to using these terms. It would not be possible for charting and administration events to be transmitted to a PES, nor would it be practical for prescribing staff to refer to the RTPM prior to charting analgesia for an acute inpatient, and the committee notes that these circumstances are already exempt from other legislative requirements that are targeted at preventing inappropriate ongoing prescribing and supply.

Representation of hospital pharmacy on ACT RTPM Working Group

Fundamentally, the implementation of a nationally consistent RTPM system in the hospital pharmacy setting will be vastly different to that of the community setting. SHPA ACT Branch Committee members therefore, strongly recommend the inclusion of a SHPA representative on the ACT RTPM working group, to ensure hospital specific considerations have been accounted for, and to help determine the practicality and budget allocation required for the integration of the national RTPM system with hospital digital infrastructure.

If you have any queries or would like to discuss our response further, please do not hesitate to contact Jerry Yik, acting General Manager, Advocacy and Leadership on jyik@shpa.org.au.

Yours sincerely,

Louise Rix

Louise Rix
ACT Branch Chair

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