



SHPA NSW Branch Committees submission to the NSW Health Draft revised policy: Approval Process of Medicines and Their Use, July 2022

Policy statement - General comments

SHPA welcomes the implementation of a single state-wide formulary to improve consistency in medicine use and improve equity of access of medicines for patients across NSW public hospitals and health services. To ensure appropriate and accurate implementation of a state-wide formulary, significant change management and education will be required for all Local Health Districts.

Procedure - General comments

In consultation with SHPA's NSW Branch Committee, several comments and queries regarding the revised policy document have been discussed in further detail below.

2 – Procedures

2.1 – Submission processes for NSW Medicines Formulary and IPU Medicines Management

The CEC standardised IPU application form(s) should be linked here. It is understood that there will be a platform developed by the NSW Medicines Formulary secretariat, and to support efficiency in these processes, the IPU application form should be developed into a webform in the platform, which would also allow tracking of progress of applications, and more convenient opportunities to provide additional information or attachments as requested.

2.2 – Management of Applications

In this section, it is not apparent how governance around local individual patient use (IPU) will be managed by the NSW Formulary Committee. The policy states local DTCs can approve IPUs and that these must be logged such that they are visible to the NSW Medicine Formulary Secretariat. However, the document does not describe explicitly the governance relationship between local DTCs and NSW Medicine Formulary Secretariat.

It appears that if a local DTC approved an IPU, the use of the medicine would still not be ensured until approval by the NSW Medicines Formulary Committee, who appear to have the right to reject any IPU applications that have been endorsed by a DTC. Whilst this section describes an appeals process, it does not mention whether feedback on the IPU application will be given by the NSW Medicines Formulary Committee, or whether there are opportunities for resubmission based off any feedback provided.

2.3 – Review of NSW Medicines Formulary

NSW Hospital Pharmacy departments are chronically understaffed when compared to pharmacist-to-patient ratios outlined in professional standards, which significantly undermines NSW hospital pharmacists to be supported and be champions of these significant changes. NSW hospitals have 25% less pharmacists compared to Victoria, despite having 25% more inpatient beds. It is envisaged that NSW hospital pharmacists will be key resources to doctors and nurses with respect to accurate and safe implementation of a state-wide formulary that provides minimal disruption to hospital care.

