

8 October 2013

Proposal to amend the Practitioner's Supply Order rules relating to certain antibiotics for rheumatic fever prevention

PHARMAC is seeking feedback on a proposal to amend the Pharmaceutical Schedule General Rules regarding a Practitioner's Supply Order (PSO) in relation to the provision of certain antibiotics for the national Rheumatic Fever Prevention Programme (RFPP).

In summary, if implemented, this proposal would result in:

- The rule relating to a PSO in Section A: General Rules of the Pharmaceutical Schedule being amended to increase the quantity of certain antibiotics that can be ordered by practitioners for patients with suspected or confirmed Group A Streptococcal throat infections for the purposes of the RFPP
- Amoxicillin 500 mg capsules and phenoxymethylpenicillin 500 mg capsules being available on a PSO
- A reduction in administrative burden for practitioners when writing PSO's for antibiotic use under the RFPP.
- The dispensing pharmacy may be able to claim the multiple service fees for dispensing in course-specific amounts as per the Community Pharmacy Services Agreement (the **CPSA**).

The RFPP is being run in regions where there is a high incidence of rheumatic fever, namely Auckland, Hutt Valley, Northland, South Auckland, Waikato, Tairāwhiti, Lakes/Bay of Plenty, Porirua East and Hawke's Bay. It is proposed that this proposal will only apply to patients with suspected or confirmed Group A Streptococcal throat infections being treated under the RFPP (in the above regions). If this proposal is implemented, practitioners would be able to order increased amounts of antibiotics specified in this proposal on a PSO for the purposes of the RFPP.

Feedback sought

PHARMAC welcomes feedback on this proposal. To provide feedback, please submit it in writing by 22 October 2013 to:

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If you would like to meet with PHARMAC to discuss this proposal please phone 04 460 4990.

All feedback received before the closing date will be considered by PHARMAC's Board (or its delegate) prior to making a decision on this proposal.

Feedback we receive is subject to the Official Information Act 1982 (OIA), and we will consider any request to have information withheld in accordance with our obligations under the OIA. Anyone providing feedback, whether on their own account or on behalf of an organisation, and whether in a personal or professional capacity, should be aware that the content of their feedback and their identity may need to be disclosed in response to an OIA request.

We will not treat any part of your feedback as confidential unless you specifically request that we do, and then only to the extent permissible under the OIA and other relevant laws and requirements. If you would like us to consider withholding any commercially sensitive, confidential proprietary, or personal information included in your submission, please clearly state this in your submission and identify the relevant sections of your submission that you would like withheld. PHARMAC will give due consideration to any such request, however, as noted above, we can only withhold it to the extent permissible under the OIA and other relevant laws and requirements.

Details of the proposal

PHARMAC is proposing to increase the maximum number of courses of certain antibiotics (detailed in the table below) available on a PSO.

Chemical	National Heart Foundation Guidelines regimen ¹	Duration	Presentation	Current maximum quantity available on a PSO	Proposed maximum quantity available on a PSO	Proposed maximum number of courses available on a PSO for patients suspected or confirmed Group A Streptococcal throat infections being treated under the RFPP
Amoxicillin	Weight <30 kg: 750 mg once daily Weight >30 kg: 1500 mg once daily	10 days	Capsules 250 mg	30 capsules	No change	10 courses of 30 Capsules (using maximum dose for those <30kg)
			Capsules 500 mg	0	30 capsules	10 courses of 30 Capsules
			Granules for oral liquid 250 mg per 5 ml	200 ml	300 ml	10 courses of 300 ml (using maximum dose for those >30kg)
Erythromycin ethyl succinate	Children: 40 mg/kg/day in 2-4 divided doses, Maximum 1g/day Adults: 400 mg twice daily	10 days	Granules for oral liquid 200 mg per 5 ml	200 ml	300 ml	2 courses of 300 ml (using maximum dose for children including wastage)
			Tablets 400 mg	30 tablets	20 tablets	2 courses of 20 tablets
Phenoxyethyl penicillin (penicillin V)	Children: 20 mg/kg/day in 2-3 divided doses, Maximum 500 mg 3 times daily (250 mg 3 times daily for smaller children) Adults: 500 mg twice daily	10 days	Granules for oral liquid 250 mg per 5 ml	200 ml	300 ml	2 courses of 300 ml
			Capsules 500 mg	0	20	2 courses of 20 capsules

¹ http://www.heartfoundation.org.nz/uploads/Algorithm_4_A_Guide_for_Sore_Throat_Management.PDF

Proposed Pharmaceutical Schedule changes

The following Pharmaceutical Schedule changes are proposed with additions in bold and deletions in strikethrough:

Section A: General Rules

5.2 Practitioner's Supply Orders

The following provisions apply to the supply of Community Pharmaceuticals to Practitioners under a Practitioner's Supply Order:

- 5.2.1 Subject to clause 5.2.3 **and 5.2.6**, a Practitioner may only order under a Practitioner's Supply Order those Community Pharmaceuticals listed in Section E Part I and only in such quantities as set out in Section E Part I that the Practitioner requires to ensure medical supplies are available for emergency use, teaching and demonstration purposes, and for provision to certain patient groups where individual prescription is not practicable.
- 5.2.2 Any order for a Class B Controlled Drug or for buprenorphine hydrochloride must be written on a Special Practitioner's Supply Order Controlled Drug Form supplied by the Ministry of Health.
- 5.2.3 A Practitioner may order such Community Pharmaceuticals as he or she expects to be required for personal administration to patients under the Practitioner's care if:
- a) the Practitioner's normal practice is in the specified areas listed in Section E Part II of the Schedule, or if the Practitioner is a locum for a Practitioner whose normal practice is in such an area.
 - b) the quantities ordered are reasonable for up to one Month's supply under the conditions normally existing in the practice. (The Practitioner may be called on by the Ministry of Health to justify the amounts of Community Pharmaceuticals ordered.)
- 5.2.4 No Community Pharmaceutical ordered under a Practitioner's Supply order will be eligible for Subsidy unless:
- a) the Practitioner's Supply Order is made on a form supplied for that purpose by the Ministry of Health, or approved by the Ministry of Health and which:
 - i) is personally signed and dated by the Practitioner; and
 - ii) sets out the Practitioner's address; and
 - iii) sets out the Community Pharmaceuticals and quantities, and;
 - b) all the requirements of Sections B and C of the Schedule applicable to that pharmaceutical are met.
- 5.2.5 The Ministry of Health may, at any time, on the recommendation of an Advisory Committee appointed by the Ministry of Health for that purpose, by public notification, declare that a Practitioner specified in such a notice is not entitled to obtain supplies of Community Pharmaceuticals under Practitioner's Supply Orders until such time as the Ministry of Health notifies otherwise.
- 5.2.6 A Practitioner working in the Rheumatic Fever Prevention Programme (RFPP) may order under a Practitioner's Supply Order such Community Pharmaceuticals (identified below) as he or she requires to ensure medical supplies are available for patients with suspected or confirmed Group A Streptococcal throat infections for the purposes of the RFPP in the following circumstances:**
- a) **the RFPP provider name is written on the Practitioner's Supply Order; and**
 - b) **the order quantity should be specified in course-specific amounts; and**
 - c) **the total quantity ordered does not exceed a multiple of:**
 - i) **ten times the Practitioner's Supply Order current maximum listed in Section E Part I for amoxicillin granules for oral liq 250 mg per 5 ml, amoxicillin cap 250 mg and amoxicillin cap 500 mg; or**

- ii) **two times the Practitioner's Supply Order current maximum listed in Section E Part I for phenoxymethyl penicillin grans for oral liquid 250 mg per 5 ml, phenoxymethyl penicillin cap 500mg, erythromycin ethyl succinate grans for oral liq 200 mg per 5 ml and erythromycin ethyl succinate tab 400 mg; and**
- d) **the practitioner must endorse the Practitioner's Supply Order with the multiple order quantity (i.e. 10 x 300 ml amoxicillin grans for oral liq 250 mg per 5 ml), and the dispensing pharmacy may claim the multiple service fees as per the Community Pharmacy Services Agreement.**

Section B

AMOXYCILLIN

Note – the maximum quantity ordered on a PSO for providers in the Rheumatic Fever Prevention Programme (RFPP) may be up to 10 x the maximum quantity for amoxicillin. The RFPP provider name must be identified on the PSO. Please refer to rule 5.2.6 of Section A: General Rules of the Pharmaceutical Schedule for full requirements.

Cap 250 mg – Up to 30 cap available on a PSO	16.18	500	✓ Alphamox
Cap 500 mg – Up to 30 cap available on a PSO	26.50	500	✓ Alphamox
Grans for oral liq 125 mg per 5 ml – Up to 200 ml available on a PSO	1.55	100 ml	✓ Ospamox
Grans for oral liq 250 mg per 5 ml – Up to 300 200 ml available on a PSO	1.10	100 ml	✓ Ospamox
Drops 125 mg per 1.25 ml	4.00	30 ml OP	✓ Ospamox Paediatric Drops
Inj 250 mg	12.96	10	✓ <u>Ibiamox</u>
Inj 500 mg	15.08	10	✓ <u>Ibiamox</u>
Inj 1 g – Up to 5 inj available on a PSO	21.94	10	✓ <u>Ibiamox</u>

ERYTHROMYCIN ETHYL SUCCINATE

Note – the maximum quantity ordered on a PSO for providers in the Rheumatic Fever Prevention Programme (RFPP) may be up to 2 x the maximum quantity for erythromycin ethyl succinate. The RFPP provider name must be identified on the PSO. Please refer to rule 5.2.6 of Section A: General Rules of the Pharmaceutical Schedule for full requirements.

Tab 400 mg – Up to 20 30 tab available on a PSO	16.95	100	✓ E-Mycin
Grans for oral liq 200 mg per 5 ml – Up to 200 300 ml available on a PSO	4.35	100 ml	✓ E-Mycin
Grans for oral liq 400 mg per 5 ml – Up to 200 ml available on a PSO	5.85	100 ml	✓ E-Mycin

PHENOXYMETHYLPENICILLIN (PENICILLIN V)

Note – the maximum quantity ordered on a PSO for providers in the Rheumatic Fever Prevention Programme (RFPP) may be up to 2 x the maximum quantity for phenoxymethylpenicillin (penicillin V). The RFPP provider name must be identified on the PSO. Please refer to rule 5.2.6 of Section A: General Rules of the Pharmaceutical Schedule for full requirements.

Cap potassium salt 250 mg – Up to 30 cap available on a PSO	9.71	50	✓ Cilicaine VK
Cap potassium salt 500 mg – Up to 20 cap available on a PSO	11.70	50	✓ Cilicaine VK
Grans for oral liq 125 mg per 5 ml – Up to 200 ml available on a PSO	1.68	100 ml	✓ AFT
Grans for oral liq 250 mg per 5 ml – Up to 200 300 ml available on a PSO	1.78	100 ml	✓ AFT

The PSO process and community pharmacy dispensing

Some factors to consider relating to the proposal are that it is proposed that:

- The practitioner must endorse the Practitioner's Supply Order with the multiple order quantity for example, 10 x 300 ml amoxicillin granules for oral liq 250 mg per 5 ml.
- RFPP provider must be identified on the PSO.
- Community pharmacy should dispense antibiotics to providers as a course e.g. 10 lots of 30 amoxicillin 500 mg capsules. Antibiotics that require reconstitution should be given to providers in their original form along with appropriately sized bottles. Note: the Ministry of Health will provide labelling guidance to community pharmacy for dispensing antibiotics for use under the RFPP.
- The dispensing pharmacy may claim the multiple service fees as per the CPSA.

Why is this being proposed?

The Ministry of Health have asked PHARMAC to look at ways to ensure at-risk patients with sore throats identified as part of the RFPP can be treated with funded antibiotics in a timely manner.

It is proposed that the changes will not apply to all antibiotics – only those specified in proposed rule 5.2.6. It is proposed that practitioners would be able to request the increased amounts of antibiotics for patients with sore throats as specified in this proposal only for the purposes of the RFPP.

Background

A national RFPP is being implemented by the Ministry of Health (MoH) with the aim of reducing the incidence of rheumatic fever. The programme is a Government health priority.

The programme is focusing on regions where there is a high incidence of rheumatic fever namely Auckland, Hutt Valley, Northland, South Auckland, Waikato, Tairāwhiti, Lakes/Bay of Plenty, Porirua East and Hawkes Bay carried out either within schools or community clinics.

PHARMAC is working with the Ministry of Health on ways to ensure at-risk patients with sore throats identified as part of the RFPP can be treated with funded antibiotics in a timely manner.