

COVID-19 Quick Guide

Authorisation for Use of digital images for supply of medicines during COVID-19 telehealth arrangements (WA)

1. Eligible medicines

Schedule 4 medicines and Schedule 8 medicines

2. Duration of revised regulation

9 April 2020 – 6pm 30 September 2020 (or until the public health state of emergency is no longer in force)

3. Implications for outpatient supply of medicines

Patients who obtain medicines from hospital outpatient pharmacies may not have an original paper prescription during the COVID-19 pandemic as it may be inappropriate for them to attend a hospital outpatient clinic, or the outpatient clinic appointment has been conducted via telehealth, or that their outpatient appointment has been cancelled.

However, patients must be able to continue to access their medicines in order to ensure continuity and adherence and avoid acute health issues that require care in a hospital.

To minimise risk of transmission to patients during the COVID-19 pandemic, under the new [Authorisation by the WA Chief Health Officer](#), Western Australian hospitals are now able to supply Schedule 4 and Schedule 8 medicines to patients based on an electronically transmitted digital image or a copy of an original prescription sent directly to the pharmacist from the prescriber.

Medicines supplied under these arrangements are eligible for PBS subsidy where normally eligible otherwise. Patients are not required to sign to acknowledge receipt of PBS supply, if it is not practical for them to do so.

For a Schedule 4 medicine, original hardcopy prescription does not need to be supplied to the pharmacy, however pharmacists must retain the digital image or copy of the prescription for two years from date of supply.

For Schedule 8 medicines, the prescriber must dispatch the prescription via post or courier within five working days after the digital image or a copy of an original prescription has been sent to the pharmacist. Until the original prescription arrives, pharmacists must keep a digital image or copy of the Schedule 8 prescription. If the original prescription is not received within ten working days, pharmacists should notify the Department of Health.

If the prescription contains repeats, then a repeat form must be generated and attached to a hard copy of the digital image. All repeats of this type must be retained at the original dispensing pharmacy. Repeats may not be returned to the patient or transferred to another pharmacy.

This enables proposed hospital practices during the COVID-19 pandemic, where to minimise patient's need to visit a hospital and reduce their risk, hospital prescribers can prescribe medicines for outpatients remotely, and send a digital image or a copy of that prescription to the hospital pharmacy for dispensing and supply to the patient via mail.

4. Practice considerations

- Determine the workflows within your health service for supplying medicines off a digital image of an original prescription
- Determine which patient groups are in the highest risk patient categories that would benefit from these arrangements. i.e. chemotherapy patients, immunosuppressed patients

- Determine which outpatient clinics would benefit most from these arrangements, particularly if your department, or certain outpatient clinics are operating with reduced capacity
- Consider how a copy of the digital image of the prescription will be retained for two years as required by the Authorisation
- Read the Department of Health's (WA) factsheet for pharmacists and prescribers: [Use of digital images for supply of medicines during COVID-19 telehealth arrangements](#)
- Read the Department of Health's (Fed) factsheet for pharmacists: [Interim arrangements for prescriptions for supply of medicines: Supporting telehealth patients and healthcare professionals](#)

5. Regulatory change details

On 9 April 2020, the Chief Health Officer (WA) made [an Authorisation to supply or prescribe a poison under the Public Health Act 2016](#), allowing until 6pm 30 September 2020:

"a pharmacist to supply a Schedule 4 or Schedule 8 poison upon receiving a digital image or a copy of a prescription for that poison, subject to the directions in Paragraph 2...

2. *The directions in this paragraph are that: ...*

(b) if the digital image or copy of the prescription is for the supply of a Schedule 8 poison:

(i) the pharmacist must notify the CEO immediately if the pharmacist does not receive the prescription for the supply of the medicine within 10 working days of the supply of the medicine; and

(ii) the pharmacist must keep a digital image or copy of the prescription until such time as they receive the prescription for the supply of that medicine; and

(c) if the digital image or copy of the prescription is for the supply of a Schedule 4 poison, the prescriber must keep the digital image or copy of the prescription for a period of at least 2 years from the date of supply; and

(d) for repeat forms, the pharmacist:

(i) must attach the repeat form or forms to the prescription or a copy of the prescription; and

(ii) must retain the repeat form or forms and the prescription or the copy of the prescription; and is not otherwise required to satisfy the requirements of regulation 24 of the Medicines and Poisons Regulations 2016; and

(e) for deferred supply of prescriptions, the pharmacist must:

(i) write the words "original supply deferred" on the copy of the prescription or digital image of the prescription; and

(ii) attach the deferred supply authorisation to the prescription or a copy of the prescription; and

(iii) retain the deferred supply authorisation and the prescription or the copy of the prescription; and

(iv) where the pharmacist writes the words "original supply deferred" on the digital image of the prescription, the printout referred to in paragraph 2(e)(iii) must be of the digital image including that writing.

These changes have also been enabled by amendments to the [National Health \(COVID-19 Supply of Pharmaceutical Benefits\) Amendment \(Expansion of Telehealth and Telephone Attendances\) Special Arrangement 2020](#) made on the 7 April 2020 that state:

"An approved hospital authority may supply a pharmaceutical benefit to a person on the first presentation of a prescription if a PBS prescriber has given the approved hospital authority dispenser a digital image of the prescription or a copy of the prescription."