



29 October 2021

Kate Oliver
eHealth and Medication Safety
Australian Commission on Safety and Quality in Health Care
Level 6, 255 Elizabeth St
Sydney NSW 2000

Dear Ms Oliver,

RE: Draft National Medication Management Plan (NMMP) User Guide

The Society of Hospital Pharmacists of Australia (SHPA) is the national professional organisation for more than 5,200 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is committed to facilitating the safe and effective use of medicines, which is the core business of pharmacists, especially in hospitals.

SHPA has advocated strongly for supporting continuity of medication management and medication reconciliation during transitions of care, and Medication Management Plans (MMP) are an important part of safe and quality transitions of care. SHPA welcomes the opportunity to comment on the NMMP User Guide and has consulted with its members in the Medication Safety Leadership Committee to obtain feedback.

SHPA notes that the User Guide states the NMMP is a paper-based format which could be used to inform a health services' transition to electronic format. Given the acceleration of electronic medical records (EMR) and electronic medication charts implementation in public and private hospitals from several software vendors, increasing the standardisation and consistency of the clinical tools and documents in EMRs such as electronic MMPs would be beneficial from a safety and quality perspective.

Overall, members reported that the User Guide complemented the NMMP version 2.0, however, SHPA would like further consideration on the 'Allergies and Adverse Drug Reactions' section of the NMMP.

SHPA members believe that the 'Allergies and Adverse Drug Reactions' section on the NMMP version 2.0 does not clearly prompt clinicians to report allergies to non-medicinal products. Other members of the multidisciplinary team, aside from pharmacists, may not recognise that reactions to food can be significant in medication selection (e.g., peanut or sesame oils, lactose). Reactions to adhesives in dressings can also affect administration site or the use of some patches. Hospital pharmacists have also refrained from using the term drug, and suggests that the term 'Adverse Reactions (Allergies)' could be used, with the User Guide stating that this refers to 'Adverse reactions or allergies to medication, food, latex, dressings, or other agent'.

If you have any queries or would like to discuss our submission further, please do not hesitate to contact Jerry Yik, Head of Policy and Advocacy on yyik@shpa.org.au.

Yours sincerely,

A handwritten signature in black ink that reads 'K. Michaels'.

Kristin Michaels
Chief Executive



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