

**Feedback template: *Consideration of proposed listing changes to antibiotic repeats on the Pharmaceutical Benefits Scheme***

Responses due back by: **21 December 2018**

Please also refer to the consultation paper for more information.

**Organisation: The Society of Hospital Pharmacists of Australia (SHPA)**

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**General comments:**

The Society of Hospital Pharmacists of Australia (SHPA) is the national, professional, for-purpose organisation for leading pharmacists and pharmacy technicians working across Australia's health system, advocating for their pivotal role improving the safety and quality of medicines use. Embedded in multidisciplinary medical teams and equipped with exceptional medicines management expertise, SHPA members are progressive advocates for clinical excellence, committed to evidence-based practice and passionate about patient care. SHPA convenes an Infectious Diseases Specialty Practice Leadership Committee who have been consulted in developing this feedback.

SHPA welcomes the Department of Health's (Department) review of repeat prescriptions for antibiotic listings on the Pharmaceutical Benefits Scheme, which SHPA supported in our submission to the consultation on Australia's First National Antimicrobial Resistance Strategy 2015-2019. Hospital pharmacists provide care to patients when they are at their sickest, often requiring complex antimicrobial medicines not typically used in the primary care setting. In recognition of their role to curb antimicrobial resistance and support the judicious use of antimicrobials, many hospital pharmacies have invested in antimicrobial stewardship pharmacists to ensure antimicrobial prescribing in hospitals is safe and appropriate.

SHPA understands that Therapeutic Guidelines Limited are due to release the next edition of Therapeutic Guidelines: Antibiotic in early 2019, which may have an impact on the Department’s proposed changes that SHPA have unanimously agreed to. Nevertheless, SHPA commends the Department on realigning the provision of PBS repeat prescriptions of antibiotics according to Therapeutic Guidelines: Antibiotic. The practice of reviewing and aligning PBS listings with current guidelines and evidence as they emerge, should be embedded into the Department’s post-market surveillance and review framework.

Beyond the options that the consultation paper has presented, SHPA believes that the prescription validity for antibiotic medicines should be shortened significantly to three months, when prescribed to treat an acute condition, to ensure these medicines are only supplied and used appropriately.

<b>Amoxicillin + clavulanic acid</b>			
<b>Listing</b>	<b>Proposed change</b>	<b>Agreed : yes / no</b>	<b>Comments:</b>
<p><b>Listing 01891M</b> – amoxicillin + clavulanic acid - tablet 500mg amoxicillin (as trihydrate) with 125mg clavulanic acid (as potassium clavulanate) Max quantity: 10 Repeats: 1</p>	<p>Noting that the same formulation is listed separately on the PBS with zero repeats, it is proposed that a streamlined authority is applied to the entire listing (01891M) for the following indications that have been identified as requiring a repeat:</p> <ul style="list-style-type: none"> <li>• Mild pyelonephritis; and</li> <li>• non-sexually acquired pelvic inflammatory disease.</li> </ul>	Yes	
<p><b>Listing 08254K</b> – amoxicillin + clavulanic acid - tablet 875mg amoxicillin (as trihydrate) with 125mg clavulanic acid (as potassium clavulanate) Max quantity: 10 Repeats: 1</p>	<p>Noting that the same formulation is listed separately on the PBS with zero repeats, it is proposed that a streamlined authority is applied to the entire listing (08254K) for the following indications:</p> <ul style="list-style-type: none"> <li>• Mild pyelonephritis;</li> <li>• non-sexually acquired pelvic inflammatory disease; and</li> <li>• bite wounds.</li> </ul>	Yes	

**Cefalexin**

Listing	Proposed change	Agreed : yes / no	Comments
<b>Listing 02655R</b> – cefalexin - capsule 250mg (anhydrous) Max quantity: 40 Repeats: 2	No change noting that the listing is already streamlined for prophylaxis of urinary tract infection.	Yes	
<b>Listing 02655R</b> – cefalexin - capsule 500mg (anhydrous) Max quantity: 40 Repeats: 1	No change noting that this listing is already streamlined for the treatment of osteomyelitis.	Yes	
<b>Listing 03058Y</b> –cefalexin – capsule 250mg (anhydrous) Max quantity: 20 Repeats: 1 <hr/> <b>Listing 03119E</b> – cefalexin – capsule 500mg (anhydrous) Max quantity: 20 Repeats: 1	Noting that the same formulations are listed separately on the PBS with zero repeats, it is proposed that a streamlined authority is applied to listings 03058Y and 03119E for the following indications: <ul style="list-style-type: none"> <li>• Infected dermatitis (only for patients with hypersensitivity to penicillin)</li> <li>• Impetigo (only for patients with hypersensitivity to penicillin)</li> <li>• Cellulitis (only for patients with hypersensitivity to penicillin)</li> <li>• Acute pharyngitis caused by streptococcal infection (only for patients with hypersensitivity to penicillin)</li> <li>• Mild pyelonephritis</li> <li>• Cervical lymphadenitis; and</li> <li>• Perianal dermatitis caused by streptococcal infection.</li> </ul>	Yes	

Amoxicillin			
Listing	Proposed change	Agreed : yes / no	Comments

<p><b>Listing 01884E</b> – amoxicillin capsule 250mg (as trihydrate) Max quantity: 20 Repeats: 1</p>	<p>Noting that the same formulation is listed separately on the PBS with zero repeats, it is proposed that a streamlined authority is applied to the entire listing for acute exacerbations of bronchiectasis.</p>	<p>Yes</p>	
<p><b>Listing 01889K</b> – amoxicillin capsule 500mg (as trihydrate) Max quantity: 20 Repeats: 1</p>			
<p><b>Listing 08581P</b> – amoxicillin tablet 1g (as trihydrate) Max quantity: 14 Repeats: 1</p>	<p>It is proposed that a streamlined authority is applied to the entire listing for the following indications:</p> <ul style="list-style-type: none"> <li>• community acquired pneumonia; and</li> <li>• pneumonia in residents of a high level care nursing home (mild)</li> </ul>	<p>Yes</p>	
<p><b>Doxycycline</b></p>			
<p><b>Listing</b></p>	<p><b>Proposed change</b></p>	<p><b>Agreed : yes / no</b></p>	<p><b>Comments</b></p>
<p><b>Listing 02708M</b> - doxycycline - capsule 100mg (as hydrochloride) containing enteric coated pellets Max quantity: 7 Repeats: 1</p>	<p>No change as pack size is too small to justify removal of repeats, with repeats required in most cases to complete treatment.</p>	<p>Yes</p>	
<p><b>Listing 02709N</b> – doxycycline – tablet 100mg (as hydrochloride) Max quantity: 7 Repeats: 1</p>			

<p><b>Listing 09105F</b> – doxycycline – tablet 100mg (as monohydrate) Max quantity: 7 Repeats: 1</p>			
<p><b>Listing 02707L</b> – doxycycline – capsule 50mg (as hydrochloride) containing enteric coated pellets Max quantity: 25 Repeats: 5</p>	<p>No changes are proposed for these listings noting that repeat prescriptions are appropriate for long term treatment of acne according to the <i>Therapeutic Guidelines: Antibiotic</i>.</p>	<p>Yes</p>	
<p><b>Listing 02711Q</b> – doxycycline – tablet 50mg (as hydrochloride) Max quantity: 25 Repeats: 5</p>			
<p><b>Listing 09106G</b> – doxycycline – tablet 50mg (as hydrochloride) Max quantity: 25 Repeats: 5</p>			
<p><b>Listing 10777F</b> – doxycycline – capsule 100mg (as hydrochloride) containing enteric coated pellets Max quantity: 28 Repeats: 5</p>	<p>These listings are restricted for prophylaxis of severe acne. No changes are proposed to these listings as repeat prescriptions are appropriate for long term treatment of acne.</p>	<p>Yes</p>	
<p><b>Listing 10779H</b> – doxycycline - tablet 100mg (as hydrochloride) Max quantity: 28 Repeats: 5</p>			
<p><b>Listing 10781K</b> – doxycycline - tablet 100mg (as monohydrate)</p>			

Max quantity: 28 Repeats: 5			
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<b>Roxithromycin</b>			
<b>Listing</b>	<b>Proposed change</b>	<b>Agreed : yes / no</b>	<b>Comments</b>
<b>Listing 8129W</b> – roxithromycin – tablet 50mg Max quantity: 10 Repeats: 1	There are limited current recommendations for these listings in the Therapeutic Guidelines and none of the current listings need repeats. The 150mg dose is listed for prophylaxis but the current quantities are inadequate. It is therefore recommended that repeats are removed.	Yes	
<b>Listing 01760P</b> – roxithromycin – tablet 150mg Max quantity: 10 Repeats: 1			
<b>Listing 08016X</b> – roxithromycin – tablet 300mg Max quantity: 5 Repeats: 1			