



30 June 2021

Opioid Dependence Treatment Program Post-Market Review Team
Department of Health
GPO Box 9848
Canberra ACT 2601
Sent via email: ODTP.PMR@health.gov.au

Dear Opioid Dependence Treatment Program Post-Market Review Team,

RE: PBS Public consultation on the draft Terms of Reference for the post-market review of medicines available under the PBS Opioid Dependence Treatment Program (ODTP)

The Society of Hospital Pharmacists of Australia is the national professional organisation for more than 5,000 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 welcomes the opportunity to provide feedback on the draft Terms of Reference for the post-market review of medicines available under the PBS Opioid Dependence Treatment Program (ODTP). SHPA members have highlighted a few recommendations listed below, to be included in this review.

Expand TOR 1: Describe and compare essential elements of models of service delivery for opioid dependence treatment (ODT) in Australia (and internationally) including best practice guidelines and current models that support access to ODT medicines through both pharmacy and non-pharmacy settings, to explicitly include transitions of care.

SHPA recommends inclusion of current models that support access to ODT medications through the transitions of care process between primary and tertiary care settings. This element is essential in providing continuity of care to patients in a safe and timely manner during high-risk transitions between healthcare settings. When patients on ODT are admitted to hospital, significant care is required to ascertain the patient's usual care arrangements in the community, their prescriber, their community pharmacy, their dosing quantity and schedules, their adherence and other clinical information that will enhance and tailor the quality of care provided in the hospital setting.

At the other end of the spectrum, a number of patients with opioid dependence initiate ODT treatment in the hospital setting when they have an unplanned admission for both dependence-related health issues or other health issues. As with all patients on ODT treatment, this requires dose titration and close monitoring until they stabilise, and robust and safe handover must be provided to their community care providers upon discharge from hospital. This also often includes hospital pharmacists identifying community pharmacies who have capacity to take on ODT patients.

Expand TOR 4: Propose alternative service delivery arrangements for access to ODT medicines, with an aim of identifying an accessible, cost-effective and efficient ODTP for both consumers and the Australian Government, to include health services, primary care providers, prescribers and pharmacists.



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SHPA supports the review into alternative service delivery arrangements and the need for these to be cost-effective and efficient for consumers and the Australian government, however the same principles must be applied to health services, primary care providers, prescribers and pharmacists who are involved in patient care and program delivery. Whilst the majority of ODT treatment is provided privately, there are a number of public clinics around the country, where more complex patients are often referred to as requiring a higher level of care.

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 jyik@shpa.org.au.

Yours sincerely,



Kristin Michaels
Chief Executive



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