

3 October 2024

PHARMAC
PO Box 10254
The Terrace
Wellington 6143

Sent via email to: consult@pharmac.govt.nz

Dear Sir/Madam,

Re: Proposal to remove the renewal criteria for stimulant treatments

The Pharmacy Guild of New Zealand (Inc.) (the Guild) is a national membership organisation representing community pharmacy owners. We provide leadership on all issues affecting the sector and advocate for the business and professional interests of community pharmacy.

Our proposal focuses on Guild members' concerns around general economic, funding and supply issues. Guild submissions should not be taken as any endorsement of, or any attempt to comment on, issues of safety, efficacy, or individual patient utility.

We wholeheartedly support Pharmac's proposal to remove the renewal criteria for stimulant treatments - methylphenidate, dexamfetamine, and modafinil - used for attention deficit hyperactivity disorder (ADHD) and narcolepsy, to improve ongoing access to these essential medicines. Our submission highlights the significant benefits this proposal offers to prescribers, pharmacists, and patients alike, particularly by reducing administrative burdens, which will improve access for those already in treatment, alleviating significant distress for patients and their whānau and positively impacting their quality of life.

Reduction of administrative burden for pharmacists

The current renewal process for stimulant treatments places a considerable administrative burden on prescribers, pharmacists, and other healthcare staff. Pharmacists must manage complex workflows related to the renewal of special authority numbers for these medicines, which frequently requires unnecessary communication with prescribers and patients. This in turn diverts pharmacists' valuable time and resources that could be more effectively utilised for patient care.

By removing the renewal criteria, pharmacists will benefit from:

- Streamlined workflows: Pharmacists will spend less time on verifying and managing special authority renewal requests and paperwork, allowing them to allocate their time and resources more effectively, enhance overall operational efficiency and enable them to concentrate more on clinical services.
- Increased focus on clinical tasks: Pharmacists will have greater capacity to concentrate on essential responsibilities, including clinical services, optimising medicine therapy and management, providing medicine counselling, supporting adherence, and dealing with complex cases, without the burden of administrative tasks.
- Reduction in prescription errors: Streamlining the process will minimise the risk of miscommunication between prescribers and pharmacists, ensuring that patients receive the appropriate treatment in a timely manner.

This proposal is a practical and essential move to improve operational efficiency in community pharmacies, ultimately enhancing the quality of care provided to this group of patients with these chronic conditions.

Improved access for patients already receiving treatment

Patients who are stable on stimulant medicines, such as those managing ADHD and narcolepsy, should not encounter obstacles in accessing their ongoing treatment. The current renewal requirements can delay access, potentially disrupting care and adversely affecting the patient's condition, leading to significant distress for patients and their whānau, and ultimately impacting their quality of life.

Removing the renewal criteria will:

- Ensure uninterrupted access to treatment: Allowing patients to no longer experience delays in receiving their treatment will facilitate better long-term management of their chronic conditions, leading to improved outcomes over time and allow patients to function effectively in their daily lives.
- Enhance treatment adherence: Streamlining the process will ensure consistent access to these vital medicines, alleviating stress and anxiety associated with potential treatment gaps. By facilitating easier access to prescribed treatments without unnecessary delays or complications, patients can feel more confident in their ability to obtain their medicines, and this reliability encourages them to stay committed to their treatment regimen and enhances their confidence in managing their condition.
- Simplify the patient experience: Reducing the number of interactions with prescribers for special authority renewals will alleviate the burden on patients, especially those managing these long-term conditions, enhancing their overall experience with the healthcare system.
- Improve equity of access: Simplifying the renewal process will reduce barriers, especially those from vulnerable populations who may struggle with navigating the complex healthcare system, giving individuals regardless of their background or circumstances a better chance of receiving consistent treatment and reducing disparities in health outcomes.

Request for clear guidance

To facilitate a smooth transition, we strongly encourage Pharmac to offer clear and comprehensive guidance to prescribers, pharmacists, and patients about these changes if the proposal is accepted. This will help prevent confusion and minimise the need for pharmacists to clarify procedural adjustments to both patients and prescribers and allow them to focus their attention on more impactful clinical activities that enhance patient care and support their communities.

If you have any questions about our response, please contact our Senior Advisory Pharmacists, Martin Lewis (martin@pgnz.org.nz, 04 802 8218) or Cathy Martin (cathy@pgnz.org.nz, 04 802 8214).

Yours sincerely,



Nicole Rickman

General Manager – Membership and Professional Services