

Image based prescriptions

Information for prescribers

Background

The Commonwealth Government's [National Health \(COVID-19 Supply of Pharmaceutical Benefits\) Special Arrangement 2020](#) (the PBS Special Arrangement) has made temporary changes to medicines regulation to make the supply of medicines during the COVID-19 pandemic more convenient and effective. One of the measures in the PBS Special Arrangement amends the usual rules for prescribing under the Pharmaceutical Benefits Scheme to allow supply of a medicine on a digital image of a prescription and provide an alternative to posting prescriptions.

To support this measure, an amendment has been made to Queensland's legislation, the Health (Drugs and Poisons) Regulation 1996 (HDPR) that:

- enables a prescriber to send a digital image of a prescription to a dispenser; and
- gives a temporary exemption from the requirement to send paper copies of prescriptions to dispensers, other than prescriptions for controlled (Schedule 8) drugs, restricted drugs of dependency (e.g. benzodiazepines) and anabolic steroids.

Arrangements for prescribers sending faxed prescriptions or digital images

In Queensland, prescribers who require to send a faxed copy or digital image of a prescription to a pharmacy must first create a paper prescription that meets all the requirements for a lawful prescription under the HDPR, **including a signature**. The prescription may then be sent to the patient's pharmacy of choice by facsimile or as a digital image such as a photo or a scanned image (e.g. a pdf). Prescribers should check with the patient's pharmacy about how they would like to receive the faxed copy or digital image of the prescription. As dispensing pharmacists have an obligation to confirm the bona fides of all prescriptions including that the prescription has been written and sent by an authorised prescriber, pharmacists may telephone prescribers to confirm a digital image or faxed prescription, particularly if receipt of the fax or image is not expected.

Digital images of prescriptions can only be sent to a pharmacy and must not be provided to patients.

If the prescription is for a restricted (Schedule 4) drug, other than a restricted drug of dependency or an anabolic steroid, the prescriber is temporarily exempt from the legal requirement (in the HDPR) to send the original prescription to the dispenser. Restricted drugs of dependency are listed in Appendix 8 of the HDPR and include benzodiazepines, codeine and phentermine.

If the paper prescription is not sent to the dispenser, the prescriber must retain the original paper prescription for a period of two years from the date it is written (whether for a PBS/RPBS or private prescription). It is recommended that prescribers make a record on the prescription and in their clinical system, that a copy or digital image was sent to the pharmacy, noting the particulars of the pharmacy and the method of transmission.

The temporary exemption from sending paper prescriptions to dispensers applies while the PBS Special Arrangement remains in place (until 30 September 2020 or as extended by the Commonwealth). Prescribers who have been acting in accordance with the PBS Special Arrangement since it came into effect on 26 March 2020, and have retained paper copies of prescriptions since that date, are taken to have complied with Queensland requirements for sending prescriptions to pharmacists and should continue to retain these prescriptions for a period of two years from the date the prescription is written.

Which prescriptions still need to be sent to the pharmacy?

There are no changes to the requirement for the prescriber to send prescriptions to the pharmacy for controlled (Schedule 8) drugs, restricted drugs of dependency and anabolic steroids. For these medicines, the paper copy of a prescription must still be sent to the dispenser within 7 days of faxing or sending the digital image of the prescription to the dispenser. This paper copy of the prescription must not be given to the patient to prevent duplicate dispensing.

It is recommended that any paper prescription for controlled drugs, restricted drugs of dependency or anabolic steroids sent to a pharmacist is marked, by the prescriber, to indicate that it is a confirmation of a request to supply on a faxed copy or digital image of the prescription.

What happens if there are repeats authorised on the digital image of the prescription?

A pharmacist must not provide the digital image, or a print-out of the digital image, of a prescription to a patient, even if the prescriber has authorised repeat supplies on the prescription. The PBS Special Arrangement requires that all remaining repeats be retained and supplied at the original dispensing pharmacy. The original dispensing pharmacy must also retain and supply any repeats on private prescriptions. A pharmacist may not give a repeat supply on a faxed copy or digital image of a prescription where the initial dispensing was made at another pharmacy. Prescribers should inform patients that only their nominated pharmacy can dispense repeats on a digital image of a prescription.

Are these interim arrangements available to hospital prescribers?

Yes. All the same requirements about sending prescriptions and retaining paper prescriptions apply.

For further information please contact:

Healthcare Legislation Improvement Unit

Email: HLIU@health.qld.gov.au