



APNA Response

*Review of the Quality Use of Medicines
Program's delivery by the National Prescribing
Service (NPS MedicineWise)*

Our Vision

A healthy Australia through best practice primary health care nursing.

Our Mission

To improve the health of Australians, through the delivery of quality evidence-based care by a bold, vibrant and well support primary healthcare nursing workforce.

Contact us

APNA welcomes further discussion about this review and our submission. Contact us on:

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Introduction

The Australian Primary Health Care Nurses Association (APNA) welcomes the opportunity to contribute to the Commonwealth Department of Health's (the department) consultation regarding the *Review of the Quality Use of Medicines (QUM) Program's delivery by the National Prescribing Service (NPS MedicineWise)* (the Review).

As per the Review's Terms of Reference (TOR), the purpose of this consultation is to seek broad stakeholder and community feedback to inform future Australian government policy settings for the delivery of the QUM Program.

We are providing this submission on behalf of our membership of Australian primary health care nurses.

Background

Primary health care nursing refers to nursing that takes place within a range of primary health care settings, each sharing the characteristic that they are part of the first level of contact with the health system.

Primary health care nurses are skilled, regulated and trusted health professionals who work in partnership with their local communities to prevent illness and promote health across the lifespan. In Australia, nurse practitioners (NP), registered nurses (RN) and enrolled nurses (EN) practice in primary health care in a range of clinical and non-clinical roles, in urban, rural and remote settings.

APNA is contributing to this consultation because primary health care nurses are inherently involved in the quality use of medicines through:

- Supporting consumers to self-administer medications by educating them to understand safe medication administration, storage and disposal
- Identification of side-effects and counselling regarding medication adherence
- Assessing consumer capacity to self-manage medications including identifying safety issues and discussing use of management tools such as dose-administration aids
- Where self-administration is not safe, administering medications to consumers in the community where such assistance is agreed to be required
- Recommending a Home Medicines Review either to a consumer directly or to their general practitioner to consider a consumer's eligibility for this service

Further to this, APNA, as a healthcare professional organisation, provides education and information to maintain, enhance and advance clinical practice by nurses within all primary healthcare settings. A significant portion of the education provided by APNA is related to medication use.

APNA is a member organisation of NPS MedicineWise and sees the benefit that it can bring to Australia's health if it achieves its stated objectives. NPS MedicineWise is seen as an independent and impartial provider of medicines information and education services by primary health care nurses. As such, APNA has representation on the following NPS MedicineWise committees: the Clinical Intervention Advisory Group and the Choosing Wisely project.

About the review

As per the Review's Terms of Reference (TOR), the purpose of this consultation is to seek broad stakeholder and community feedback to inform future Australian government policy settings for the delivery of the QUM Program.

Summary of APNA position

APNA believes the NPS MedicineWise QUM Program has a role to play in improving the health of Australians through evidence-based and effective use of medicines. It has delivered important regular education to health professionals with respect to quality use of medicines over many years.

However there is a need to re-establish government policy settings for the delivery of this program. These policy settings need to safeguard the independence of the NPS MedicineWise QUM Program. They also need to ensure that initiatives that form part of the QUM Program are informed by evidence, and that these are transparently and independently monitored and evaluated.

APNA also believes that a national framework is required to clearly set out the overarching view of the Australian Government for the work of NPS MedicineWise and other organisations involved in quality use of medicines. This would assist in ensuring that all QUM activity is coordinated, complementary to the work of each organisation, minimises duplication, and delivers on an overarching national strategy.

APNA Submission

The vital role of the primary health care nurse in quality use of medicines

To provide some contextual information as to why this consultation is of relevance to APNA and primary health care nurses, we will provide a brief overview of the vital role primary health care nurses play in the quality use of medicines for consumers:

- Primary health care nurses can play a vital role in addressing rising healthcare costs and increasing rates of complex and chronic health conditions. When working to their full scope of practice, primary healthcare nurses can contribute to facilitating better outcomes for patients, enhanced productivity and value for money for the health systems and services in which they work.
- The Australian Nursing and Midwifery Federation (ANMF) position statement *Quality use of medicines* (ANMF 2015) adequately summarises the primary health care nurse role in quality use of medicines.
- Primary health care nurses play a key role in the administration of new and emerging medicines in the community setting, and it is anticipated that this aspect of their role will continue to grow. Primary health care nurses enable this innovation by providing patient support and education as

well as medication administration in the community, be this in within a primary health care service or in a home-based setting. This is well within the scope of practice for a NP and RN. There are well documented benefits of the provision of care in the community, to both the health system and consumers (Primary Health Care Advisory Group 2015). Greater utilisation of the primary health care nursing workforce with regards to this issue may bring about a reduced burden on the health care system.

- Primary health care nurses (most commonly RNs) are also now commonly working within pharmacy settings. As an example of this, in Victoria there is the Victorian Government *Victorian Supercare Pharmacies Initiative* (Department of Health and Human Services 2018b). These Supercare Pharmacies provide after-hours access to face-to-face advice, treatment for minor injuries and illnesses, and medicines. Pharmacies who are part of this initiative must provide access to a RN approximately 6-10pm. Whilst this role is not specifically focused on medicines, there is indeed the requirement for RNs in this role to support quality use of medicine from this perspective.

Response to the Review's Terms of Reference

We now provide APNA's viewpoint on the NPS QUM Program with respect to the TOR for the Review.

NPS MedicineWise's governance and administrative policies and practices

APNA supports the *National Medicines Policy* (Department of Health and Ageing 2000) and the *National Strategy for Quality Use of Medicines* (Department of Health and Ageing 2002) in principle, however notes these documents were developed in 2000 and 2002 respectively. The Australian health care system has evolved across Australian states and sectors since this time and it is likely that these documents require review.

Since 2002, the number of organisations involved in activities aimed at improving QUM has increased – at a minimum this includes the Australian Commission on Safety and Quality in Health Care (ACSQHC), the Australian Institute of Health and Welfare (AIHW) and some Primary Health Networks (PHN). There are also a number of State Government initiatives. It is unclear what the overarching view of the Australian Government is as to how these organisations and their activities integrate and align towards achieving the aims and objectives of the QUM program, as stated in the *National Strategy for Quality Use of Medicines*.

As an example, such an overarching view would be beneficial to strongly align work that the ACSQHC conducts in setting and measuring against QUM performance indicators, with the strength of the NPS MedicineWise initiatives which focus on providing educational support to influence behavioural change to occur in both health professionals and consumers.

Further, as with many systemic safety and quality national policy level initiatives, quality use of medicines work by the ACSQHC has largely focused on hospital system (ACSQHC & NSW Therapeutic Advisory Group Inc 2014). This is similarly the case at the state level (Department of Health and Human Services 2018a). APNA proposes that within the context of Australia's health care system increasingly focusing on primary health interventions to reduce the risk of medicines misadventure,

there is scope to explore systemic initiatives to improve quality use of medicines in the primary health care sector e.g. QUM indicators for the community.

Recommendations:

- A revised national strategy for QUM is required, that depicts a high level framework that sets out a clear overarching view of the Australian Government for the work of NPS MedicineWise and other organisations involved in QUM activity. This would help to ensure that all activity undertaken on this issue is coordinated and minimises duplication, and feeds up to the overarching view and strategy.
- This framework should focus on:
 - Multidisciplinary education including for any new prescribers
 - Consumer education
 - Research
 - Minimising misadventure and hospital presentations related to misuse of medications
 - Promoting screening activities to prevent medicines misadventure
- Any savings attained from a more coordinated approach to quality use of medicines, could be directed toward implementing further initiatives by NPS MedicineWise or other organisations tendered to work on this issue.
- Funding should be provided to the ACSQHC to develop quality use of medicines indicators for the primary health care system.

The effectiveness, efficiency and appropriateness of the work delivered by NPS MedicineWise to achieve the objectives and outcomes of the QUM grant program

APNA notes that there is little publicly available information to provide clarity on the objectives and intended outcomes of the QUM Grants Program.

While the findings of the *NPS MedicineWise Program Evaluation* (NPS MedicineWise 2017) are notable, the evaluation was not conducted independently which may create a barrier to the building of credibility for the work of NPS MedicineWise and to increasing the confidence of its stakeholders. Also, the only publicly available information as to the outcome of this evaluation is an executive summary report, which does not provide any detail as to the method of the evaluation.

NPS MedicineWise annual reports indicate progress towards building greater independence in funding through the pursuit of sources other than the Australian Government.

NPS MedicineWise is highly regarded and trusted by both consumers as clinicians due to its structure as a not-for-profit organisation that is independent of government, as well as pharmaceutical and other vested interests. These points are key to the credibility of the organisation as a provider impartial information and services.

Recommendation:

- Public reporting of objectives and intended outcomes, with related evaluation and monitoring is required, to assist with transparent understanding of the outcomes of Australian Government spending on the QUM Grants Program, to develop further credibility and confidence in the work delivered by NPS MedicineWise.

Is the methodology used by NPS MedicineWise for attributing savings from its activities and identify options to ensure the methodology is robust and defensible

As stated above, there is little publicly available information to support a full response to the Review. Accordingly it is not clear what methodology the Review is referring to, so we are not able to comment on this point of the Review.

How can NPS MedicineWise best target activities to deliver value for money, improve linkages with relevant stakeholders and achieve the quality use of medicines expected of Government, taking into consideration the potential impact of the recent decision to reduce funding to NPS MedicineWise and NPS MedicineWise's ability to continue to deliver on the core program objectives

NPS is a well-recognised and trusted brand and service provider for many health professionals, including primary health care nurses. APNA believes it can play an important role in guiding the quality use of medicines at the national level and providing valuable clinically focused resources to this effect.

Some PHNs are undertaking activity in relation to quality use of medicines according to the needs of their local populations. PHNs are 31 individual organisations with varying business and program structures. They are tasked to identify the needs of their local populations, but may not have the resources and/or expertise to develop resources to address all of these needs. NPS MedicineWise has the capability to provide nationally consistent content and has demonstrated flexibility in the development of programs to meet changes in the health environment – for example relating to rationalising test and medical interventions. There is opportunity for NPS MedicineWise to formally align with the PHNs in this respect, to undertake the resource development work and facilitate local delivery where needed, if adequate funding is provided to NPS MedicineWise to carry out this work.

Similarly, NPS MedicineWise has in the past provided regular face-to-face workplace training/updates to the multidisciplinary primary health care team, and continues to do so in a limited capacity. These activities are highly regarded by health professionals, and APNA members have reported that they believe this is an important role of NPS MedicineWise. This locally delivered education by NPS MedicineWise has been seen as integral to behavioral change to support quality use of medicines. Often the most common form of medicines information filtering into general practice is delivered by pharmaceutical companies regarding their own products. NPS MedicineWise is seen as an important provider of impartial, credible information for clinicians, given that maintaining current knowledge with new and updated medicines guidelines and changes to the Pharmaceutical Benefits Schedule can be challenging.

Models of care that enhance the primary health care nurse capacity to address quality use of medicines with consumers should be further explored by the QUM Program. However, it would be important that such models are integrated with other improvement work occurring across the health care system.

As the Review would be aware, the Nursing and Midwifery Board (NMBA) is currently exploring a new registration standard for RNs to enable them to prescribe scheduled medicines in partnership with a registered prescriber i.e. a medical or nurse practitioner. This NMBA has proposed that this registration standard will require two units of education to increase scope of practice in this regard, that addresses the NPS MedicineWise Prescribing Competencies Framework. Ongoing education on the quality use of medicines will also be required, as for any RN or medication-endorsed EN. There may be a role for the QUM Program to support this education.

Recommendations:

- Continued funding for NPS MedicineWise to develop important clinical resources to support quality use of medicines and to provide other training is required.
- The formation of closer links with PHNs to help inform the targeting of NPS programs at a local level to assist clinicians to meet the needs of their local population.

Concluding comments

APNA takes the following position on the policy settings for the delivery of the Quality Use of Medicines program:

- That the QUM Program, in whatever form it takes, continue to be independent and is not required to answer to special interest groups.
- That the QUM Program continues to:
 - Enhance delivery of regular education to health professionals, including primary health care nurses, with respect to the quality use of medicines
 - Explore and develop models of care that enable healthcare professionals to actively support consumers in the quality use of medicine.
- That the QUM Program's objectives and programs are informed by evidence and transparently and independently monitored and evaluated.
- That a revised national strategy for the QUM Program is required, that depicts a high level framework setting out a clear overarching view of the Australian Government for the work of NPS MedicineWise and other organisations involved in quality use of medicines activity. This would help to ensure that all activity undertaken on this issue is coordinated and minimises duplication, and feeds up to the overarching view and strategy.

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