

Image based prescriptions

Information for pharmacists

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 dispensers.

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 dependency¹ and anabolic steroids.

Arrangements for faxed or digital images of prescriptions

In Queensland, prescribers may now send a faxed copy or digital image of a paper prescription to a pharmacy. The prescription must meet all the requirements for a lawful prescription under the HDPR, **including a signature**. Prescriptions may be sent by facsimile or as digital image such as a photo or scanned image (e.g. a pdf). **Digital images of prescriptions may 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 paper prescription to the dispenser but must retain the paper copy themselves for a period of 2 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.

This 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

¹ Restricted drugs of dependency are listed in Appendix 8 of the HDPR and include benzodiazepines, codeine and phentermine.

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. Pharmacists who have dispensed on digital images and faxed prescriptions sent by prescribers since 26 March and in accordance with the PBS special arrangements, are also taken to have dispensed on a lawful prescription and are not required to report non-receipt of the paper prescription, noting that paper prescriptions must be received for controlled drugs, restricted drugs of dependency and anabolic steroids.

Which prescriptions still need to be sent to the pharmacy?

There are no changes to the requirement for a prescriber to send a paper prescription to the pharmacy for controlled drugs, restricted drugs of dependency and anabolic steroids. The paper prescription for these medicines must still be sent to the dispenser within 7 days of being faxed or sent as a digital image and must not be sent to the patient. To support traceability, it is recommended that prescribers mark the paper prescription to indicate that it is a confirmation of a previously faxed or digitally transmitted prescription.

What are pharmacists required to do if they receive a faxed copy or a digital image of a prescription?

The amendment provides new methods that prescribers may use to transmit prescriptions to a pharmacist and allows pharmacists to dispense on faxed copies and digital images of prescriptions however, prior to dispensing, pharmacists are obliged to confirm the bona fides of all prescriptions, including that it was written and sent by an authorised prescriber. In addition, there are fewer tangible features that may assure a pharmacist of the authenticity of a prescription available on faxed copies and digital images of prescriptions compared to paper prescriptions. These circumstances may create practice ambiguities for pharmacists and added complexity when verifying the authenticity of a prescription.

Pharmacists may meet the obligation to confirm the bona fides of a copy or digital image of a prescription if they are able to demonstrate that they are familiar with the prescriber's signature AND contact details (e.g. email address, fax number). Otherwise, pharmacists must take reasonable steps to confirm prescriptions, such as phoning the prescriber (preferably on an independently obtained phone number) and should document the steps taken. To avoid work interruptions, it is recommended that prescribers and pharmacists agree on secure and effective processes for sending and receiving digital images that is acceptable to both parties.

What records are pharmacists required to keep?

If a pharmacist dispenses on an image of a private prescription and does not receive the paper copy of the prescription, or under the PBS Special Arrangement, they are required to retain the faxed copy, digital image or a printout of the digital image of a prescription on which they have dispensed for a period of 2 years for audit and compliance purposes.

Existing requirements in the HDPR about keeping records of all dispensed medicines have not changed however, for audit and compliance purposes, it is recommended that pharmacists record in their dispensing system when they have made a supply on a faxed copy or digital image of a prescription and where the faxed copy or digital image is stored or saved.

What happens if there are repeats authorised on the digital image of 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 must not provide the digital image (or a print-out of the digital image) to a patient, even if the prescriber has authorised repeat supplies on the prescription. Also, a pharmacist may not make a repeat supply on a faxed copy or digital image of a prescription where the initial dispensing was done at another pharmacy.

How does this affect existing paper prescriptions and repeats?

Patients with existing prescriptions are not able to send a digital image of their prescription to a pharmacy. If a patient is confined to their home, they may seek a telehealth consultation with their prescriber who may choose to send a faxed copy or a digital image of a prescription to the patient's nominated pharmacy.

Are these interim arrangements available to hospital prescribers?

Yes. All the same requirements apply to prescriptions written by hospital prescribers and dispensed by hospital pharmacists.

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