



# Secretary

Department of Health & Human Services

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7 JUL 2015



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Cheryl Vella  
Coroners Registrar  
Coroners Court of Victoria  
65 Kavanagh Street  
SOUTHBANK VIC 3006

Dear Ms Vella

I am writing in response to your letter of 25 February 2015 relating to Coroner Paresa Spanos' recommendations to the Department of Health & Human Services in her finding into the death with inquest of Mr Philip Black (court ref: COR 2010 003699).

The department apologises for the delay in this response and would appreciate in future all findings where the Coroner directs copies be sent to the department be sent to my office to ensure future responses will be within statutory deadlines.

The department's response to the Coroner's recommendation is as follows:

**Recommendation:**

2. *That Drugs and Poisons Regulation (Department of Health and Human Services, Victoria) and its Drugs of Dependence Advisory Committee considers amending the Victorian Policy for Maintenance Pharmacotherapy for Opioid Dependence, to include a mandatory requirement that health practitioners prescribing methadone comply with the National Clinical Guidelines and Procedures for the Use of Methadone in the Maintenance Treatment of Opioid Dependence, unless there is a sound and documented clinical basis for departure.*

**The department's response:**

Recommending mandatory practices in clinical guidelines is contrary to the very nature of guidelines, which provide advice of a general nature to guide practice while also providing practitioners with the ability to tailor their activities for individual patients based on an assessment of their distinctive needs as assessed by a thorough evaluation of their clinical state and circumstances. Many guidelines are accompanied by disclaimers stating this principle.

While the *Policy for Maintenance Pharmacotherapy for Opioid Dependence* advises practitioners to be familiar with the *National Guidelines for Medication-Assisted Treatment of Opioid Dependence* when prescribing methadone, it is not appropriate for the department to place mandatory requirements which compel practitioners to comply with guidelines for treatment decisions which are of a clinical nature.

Where there are concerns that a practitioner's conduct or practice is considered below the standard expected of a practitioner or places the public at risk of harm, these matters are appropriately the remit of the practitioner's relevant Board for consideration of further action.

**Recommendation:**

3. *That Drugs and Poisons Regulation and its Drugs of Dependence Advisory Committee considers amending the Victorian Policy for Maintenance Pharmacotherapy for Opioid Dependence, to include a mandatory requirement that health practitioners prescribing methadone complete ongoing training in relation to the Victorian Policy for Maintenance Pharmacotherapy for Opioid Dependence, and the National Clinical Guidelines and Procedures for the Use of Methadone in the Maintenance Treatment of Opioid Dependence, at regular intervals, and that compliance be audited.*

The department undertakes to review the delivery of ongoing pharmacotherapy training to prescribers, in line with the recommendation.

The *Policy for Maintenance Pharmacotherapy for Opioid Dependence* advises practitioners to be familiar with the pharmacology of the drugs used for pharmacotherapy and the management of drug addiction necessary to ensure that treatment of opioid dependence with pharmacotherapy is performed safely and successfully. The department funds training that is available free of charge to medical practitioners (or nurse practitioners) intending to become prescribers, and also to currently approved prescribers wishing to attend a clinical update or refresher training. Training is facilitated throughout the state by Networking Health Victoria.

All medical practitioners may prescribe buprenorphine/naloxone for up to five patients without the requirement to undergo training or assessment to become an approved prescriber. Prescribers are however encouraged to complete the online training for general knowledge via Module 1: *Safe Opioid Prescribing*. Prescribers who then choose to take on greater than five patients, or those who wish to prescribe methadone (to any number of patients), must complete a day of face-to-face training in Module 2: *Prescribing Buprenorphine and Methadone*. Module 1 is a prerequisite to Module 2.

The department's Pharmacotherapy Development Officer and funded Area Based Pharmacotherapy Networks also work with prescribers to ensure they are aware of and practice in accordance with the Victorian policy.

Please note that the Advisory Group on Pharmacotherapy has completed its work in assisting with the review of the Policy. The Coroners Court will be notified when the updated Policy is released.

If you require further information please contact Mr Graeme Gillespie, Chief Officer, Drugs and Poisons Regulation on 9096 5066 or email [graeme.gillespie@dhhs.vic.gov.au](mailto:graeme.gillespie@dhhs.vic.gov.au).

Yours sincerely



**Dr Pradeep Philip**  
Secretary