



# Department of Health & Human Services

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Office of the Secretary

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Sheean Werkmeister  
Coroner's Registrar  
Coroners Court of Victoria  
65 Kavanagh Street  
SOUTHBANK VIC 3006

Dear Mr Werkmeister

I am writing in response to your letter of 31 October 2014 relating to Judge Ian Gray's recommendations to the Department of Health & Human Services in his finding into the death with inquest of Ms Anne Brain.

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

**Recommendation:**

1. *I recommend that the Victorian Department of Health progress the implementation of a Victorian-based real-time prescription monitoring system as a matter of urgency to prevent ongoing harms and deaths associated with pharmaceutical drug misuse and inappropriate prescribing and dispensing of pharmaceutical drugs.*

**The department's response:**

With the recent change of Government, the department is providing advice to the Minister for Health on the issue of prescription drug misuse and the need to reduce the harms and deaths related to prescription shopping. The department is also advising the Minister on all issues relating to real-time prescription monitoring implementation. These matters are currently being considered by the Government.

However, it should also be noted that people are prepared to cross state borders to engage in prescription shopping activities. Accordingly, the most effective response to the problem of prescription shopping requires a nationally coordinated solution involving the efforts of prescribers, pharmacists and all the regulatory bodies concerned.

**Recommendation:**

2. *I recommend that while the Victorian Department of Health continues with its efforts to implement a real-time prescription monitoring program for Schedule 8 drug dispensing, it also identifies the legislative and regulatory barriers that might prevent drugs listed in other schedules (particularly Schedule 4) from being monitored within the scope of the program. If any such barriers are identified, I recommend that the department then considers what reforms are*

*necessary so that in due course its real-time prescription monitoring program can be expanded beyond Schedule 8 drugs. This will enhance clinicians' ability to make appropriate clinical decisions about patients.*

**The department's response:**

Schedule 8 poisons are the minimal set of drugs which a real-time prescription monitoring system should monitor, as they are the prescription medications that pose the highest level of risk to the community. However, the department is very interested in data that the Coroners Prevention Unit has presented in previous findings, which shows that other prescription drugs such as benzodiazepines also contribute to a significant number of drug-related deaths. Accordingly, the department will certainly consider the best way to deal with this issue.

This issue may be progressed within the context of real-time prescription monitoring, or alternately through other nationally consistent approaches, such as medicines scheduling. For example, last year the benzodiazepine alprazolam was rescheduled when it became apparent that its prescription and usage demonstrated that the tighter regulatory controls mandated for Schedule 8 poisons were warranted.

**Recommendation:**

- 3. I recommend that the Victorian Department of Health consider meeting with private health information technology developers and vendors to discuss and, if appropriate, address the legislative and regulatory barriers that might prevent private companies providing real-time prescription monitoring capacity through their products and services.*

**The department's response:**

Implementation of real-time prescription monitoring would require many complex issues to be addressed to ensure that an effective system is made available to prescribers, pharmacists and regulators, including making legislative amendments to mandate the collection of prescription records from all pharmacies in Victoria by the department for the purposes of enabling access for prescribers and pharmacists to view these records. To that end, all key medical and pharmacy stakeholders would need to be consulted upon implementation, and this would also include all medical and pharmacy software vendors.

If you require further information please contact Mr Matthew McCrone, Chief Officer, Drugs and Poisons Regulation on 9096 5066 or email [matthew.mccrone@health.vic.gov.au](mailto:matthew.mccrone@health.vic.gov.au).

Yours sincerely



**Dr Pradeep Philip**  
Secretary