

Secretary

Department of Health & Human Services

25 MAR 2015



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Hannah Summerhayes
Coroners Registrar
Coroners Court of Victoria
65 Kavanagh Street
SOUTHBANK VIC 3006

Dear Ms Summerhayes

I am writing in response to your letter of 18 December 2014 relating to Coroner Jacinta Heffey's recommendations to the now Department of Health & Human Services in her finding into the death with inquest of Mr Paul Kanis.

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

Recommendation:

- 1. As a matter of urgency, the Victorian Department of Health must implement a real-time prescription monitoring system that records information on dispensing of all Schedule 8 drugs and all Schedule 4 drugs of dependence in Victoria and makes this information available to all Victorian pharmaceutical drug prescribers and dispensers, so they can use the information to inform their clinical practice and reduce the harms and deaths associated with pharmaceutical drugs.*

The department's response:

The Government is committed to ensuring that all Victorians receive the best health care and treatment possible and that includes ensuring there are effective communication channels between health professionals. The Government acknowledges the growing public health issue of prescription shopping and deaths from prescription medicine misuse.

To this end, the Minister for Health has directed the department to proceed with arrangements to sign a sub-licence agreement with the Commonwealth to gain access to the Electronic Recording and Reporting of Controlled Drugs software. This will enable the department to evaluate that software for its suitability in meeting Victoria's requirements for a real-time prescription monitoring system. This will bring Victoria into alignment with other States and Territories in being able to readily access that technology.

The introduction of real time prescription monitoring requires consideration and planning. The Minister for Health has asked the Department to provide advice on the necessary steps to implement real-time prescription monitoring.

It is broadly accepted that a national real-time prescription monitoring system would be the most effective tool in assisting doctors and pharmacists. Therefore, the Minister will be writing to the Commonwealth Minister for Health to begin discussions regarding establishing a partnership for implementing a national system.

Recommendation:

2. *That the Victorian Department of Health seek advice from the Advisory Group for Drugs of Dependence, regarding whether guidance should be produced to assist doctors who treat Opioid Replacement Therapy (ORT) clients for conditions other than opioid dependence. Particular areas of guidance might include how and when to communicate with the patient's ORT provider, pharmaceutical drugs that can interact with the drugs prescribed in ORT, and warning signs that the patient might be becoming unstable in ORT (and what to do if these warning signs are identified).*

The department's response:

The department's *Policy for Maintenance Pharmacotherapy for Opioid Dependence* already advises practitioners on the necessity of communication between treating practitioners.

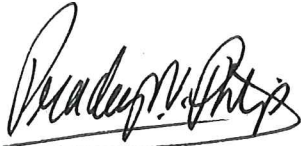
However, it is beyond the department's sphere of responsibility to provide detailed guidance to doctors on how to perform what are basic clinical competencies. It is expected that a trained medical practitioner already has the professional competencies to conduct a thorough patient assessment, including taking a medication history and observing a patient's general presentation and wellbeing. Medical practitioners can be expected to routinely consider the potential side effects and drug interactions of medicines which are being prescribed to their patient, particularly for drugs of dependence that are known to cause sedation and respiratory depression. They can also be expected to know when to appropriately refer to other practitioners for further patient management.

There are existing national clinical guidelines for pharmacotherapy treatment available for doctors and pharmacists to refer to for advice of a clinical nature, *viz. the National Guidelines for Medication-Assisted Treatment of Opioid Dependence*. These guidelines advise clinicians that communication between practitioners to obtain relevant patient information and history is an important part of a comprehensive patient assessment. These guidelines also provide advice to clinicians on formulating co-ordinated care plans with all healthcare providers involved in the patient's care to further facilitate communication between practitioners.

The department is also aware that the Royal Australian College of General Practitioners is developing guidelines for the prescribing of drugs of dependence in general practice. The department considers those guidelines will be of great value to assist medical practitioners with the appropriate clinical management of patients who are prescribed drugs of dependence. To this end, Coroner Heffey's finding and the department's response will be forwarded to the Royal Australian College of General Practitioners for its consideration in the development of those guidelines.

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.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Pradeep Philip', written over a horizontal line.

Dr Pradeep Philip
Secretary