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29th May 2024

Circular 008/24

Pharmacy Expert Taskforce - Phase 1 Recommendations

Dear Pharmacist,

In line with amendments to the legislation¹ since 1 March 2024, prescribers may issue prescriptions with a legal validity of up to 12 months where they deem it clinically appropriate. From 1 March 2024, prescriptions can be dispensed for up to 12 months from the date they are written where the prescriber has indicated this on the prescription. A prescription must not be dispensed more than 12 months after the date specified on the prescription.

Furthermore, the legislation enables pharmacists to extend the validity period of prescriptions written for 6 months or more – up to a maximum of 12 months. This legislative change only applies to prescriptions written on or after 1 March 2024. This means that in practice, pharmacists will not be making decisions to extend or not extend prescriptions under the new legislation until on or after 1 September 2024.

PCRS recognise that there are a small number of areas under Community Drug Schemes as set out below that would not be considered appropriate for pharmacist extension at this time due to the nature of the particular medicines and as a matter of patient safety. There are also reimbursement exclusions to extending a prescription beyond 6 months in line with the specified legislation exclusions.

High Tech Medicines

As pharmacists are aware, these high cost hospital prescribed medicines, which are paid for by the HSE and dispensed in the community pharmacy are managed under the High Tech Arrangements. However, clinical oversight is provided under the leadership of Consultants.

Due to clinical follow-up required within the hospital setting for these types of medicines, pharmacists will not be in a position to extend High Tech prescriptions until detailed engagements with clinical experts around the risks and benefits can be facilitated. This will ensure that patients continue to attend their hospital appointments within the required timeframe and are carefully monitored to ensure therapeutic benefit and patient safety. Consultation with appropriate clinical programmes may over time identify clinical areas within the High Tech medication space that could be considered appropriate for pharmacist extension.

Please note that if the hospital clinician wishes to prescribe up to 12 months of a High Tech medicine, this is acceptable under High Tech Arrangements. The High Tech Hub has been updated to facilitate prescribers to issue High Tech prescription forms up to 12 months in duration.

HIV Pre-Exposure Prophylaxis (PrEP)

As agreed with the HSE Sexual Health Programme, it is recommended that PrEP products reimbursed under Community Drug Schemes are excluded from pharmacist prescription extension. Extending a HIV PrEP prescription to 12 months could lead to harm for individuals, specifically the risk for antiretroviral resistance in the setting of an unknown HIV diagnosis and continued HIV PrEP use. The HSE currently has an arrangement in place to supply these products free of charge when prescribed to an approved person (ref: Pharmacy Circulars 41/19, 44/19 and 09/21).

Controlled Drugs

As communicated by the pharmacy regulator – the PSI, there are situations where prescription extension for long-term medication may not be appropriate or other situations where it is not permitted under legislation. Please note: Medication that is listed as a controlled drug in Schedule 2, 3, or 4 of the Misuse of Drugs Regulations 2017 (as amended), are not suitable for prescription extension.

'Do not extend'

The legislation allows a prescriber to insert the words 'Do not extend' on a prescription to indicate to the pharmacist that the medicinal product or prescription is not suitable for extension. Pharmacists are not permitted to extend prescriptions where this instruction is indicated on the prescription.

Under Community Drug Schemes, a valid prescription is required to support reimbursement claims submitted to PCRS for payment. Pharmacists are also reminded of their legislative record keeping requirements in relation to the decision to extend a prescription.

It is recognised that the expansion of the pharmacist scope of practice is an important measure to assist the healthcare system and that permitting a pharmacist to extend a prescription to 12 months within the regulatory framework is welcome.

Yours faithfully,

Shaun Flanagan Primary Care Reimbursement Service