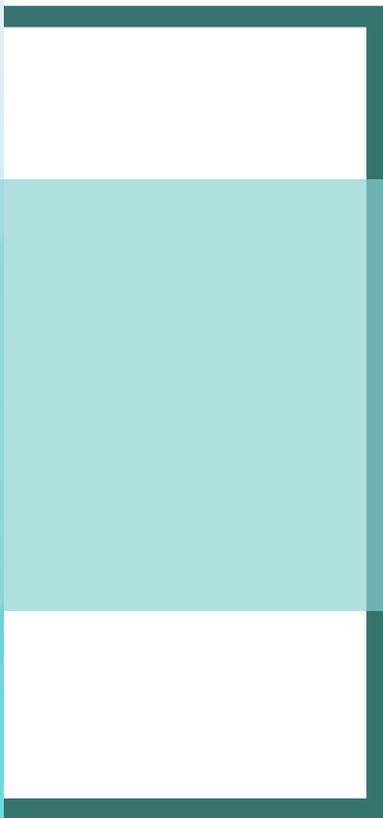


The logo for Pain Australia, featuring the word "pain" in red and "australia" in black, set against a background of overlapping blue and teal geometric shapes.

painaustralia

Regulation to support Real Time Prescription Monitoring

A dark teal L-shaped graphic element consisting of two perpendicular lines forming a corner, positioned on the right side of the page.

Submission from
Pain Australia
MARCH 2021

Painaustralia appreciates the opportunity to provide a response to the *New South Wales' Government Regulation to Support Real Time Prescription Monitoring (RTPM) Consultation Paper* (the Paper).

Painaustralia is Australia's leading pain advocacy body working to improve the quality of life of people living with pain, their families and carers, and to minimise the social and economic burden of pain on individuals and the community.

Painaustralia supports the potential of RTPM systems to minimise harm for consumers. However, its potential punitive impacts need to be mitigated for people living with chronic pain and other chronic conditions. Addressing the problem of over-use of prescription painkillers, where there is an underlying issue of chronic pain, requires a nuanced approach that focuses on the consumer's needs.

Painaustralia was involved in the Victorian roll out of the RTPM and currently sits on the N.S.W. Peak Body Reference Group and the A.C.T. Stakeholder Engagement Group on RTPM. The issues we highlight are based on our experience with the Victorian roll out as well as consumer consultations through our online platforms and Consumer Advisory Group.

Painaustralia calls for the NSW Government, and all Governments implementing RTPM systems, to address or consider the following issues.

A individualised approach to chronic pain management

People living with chronic pain may be on a certain medication regimen which falls outside of the recommended or ideal prescribed usage. Some of the reasons for this may be due to long wait times to see a pain specialist, the individual living in a rural or remote areas and not being able to see a GP or health professional easily, the affordability of alternative treatments such as surgery, or simply that there are no alternative pain management options available such as allied health services.

If harm minimisation is the stated intention, whether by a system based or integrated into prescribing training, RTPM should be able to identify and provide support for people living with chronic pain, including referral to appropriate treatment options.

An individualised approach to treat people living with chronic pain is required including pain management referral options.

Prescriber training in best-practice assessment and treatment of pain

Consumers who have their access to pain medication impacted by RTPM need to be supported by prescribers who are trained in best practice pain management. The prescriber should be able to engage in a constructive conversation with the consumer to help them find an alternate therapy.

Due to the opioid regulatory changes implemented in 2020, we hear from consumers that they are turning to alternative and suboptimal pain management strategies such as alcohol, cannabis and alternative pain medications that they can access. At the point that a consumer is flagged to be at risk or have an alert arise due to their medication regimen, the prescriber should have clear guidelines and protocols that will ensure that they provide key information about other therapy options.

Training in best practice pain management for prescribers should be informed by consumers.

Access to public pain services, particularly for people in regional Australia

We hear from our members and consumers nationwide about the long wait times and the lack of affordability to see a pain specialist. In metropolitan cities it is months but in rural and regional areas it can be over a year. There simply are not enough services to support the 3.4 million Australians who live with chronic pain and RTPM may result in one pain management solution being limited without there being a viable alternative for consumers.

Implementation of RTPM in any jurisdiction needs to be supported by funding for additional services.

As the Department may be aware, Painaustralia manages the National Pain Services Directory, a repository of pain specialists and associated services across Australia that consumers can access to find support in their area. We are currently updating this vital service and we hope that it will lead many of the millions of Australians who live with chronic pain connecting with pain specialists and allied health services who can help them manage their condition.

The Directory is free to use and we would support reference to it in any education and training materials being developed by the NSW Government.

Consistency and data transparency across jurisdictions

There must be a consistent approach across all jurisdictions in the implementation of RTPM, or at least a rationale provided for why they might differ.

We are aware of some data access issues in Victoria where the state coroner can sometimes experience a delay in accessing RTPM data to determine if prescription painkillers were a contributing factor to a death. This may result in prescriber behaviour going unchecked for longer than needed before any action is taken.

As harm minimisation is the primary driver of RTPM systems, it is essential that data is accessible simply and readily by those who are positioned to mitigate future harm.

There needs to be transparency and ease of access to the data across jurisdictions.

Consumers should be able to obtain information held on their RTPM record.

Access and a simple review and complaints process

The Paper states that consumers have rights both under State and Commonwealth privacy laws to request access from the Ministry of Health to their health information, including their records pertaining to RTPM. The Paper outlines that a consumer may have their RTPM record corrected by a similar mechanism.

It is unclear exactly what this mechanism will look like, whether consumers will be made aware of it and what the review process is.

The Paper does not explicitly state that there will be a complaints mechanism. The need for a complaints' mechanism is paramount for circumstances in which the consumer is seeking a review of a decision or is concerned about an aspect of the process.

Access, review and complaints mechanisms should be developed. They should be clearly and simply presented on the NSW's RTPM website and integrated into prescriber training. Public facing communication by the NSW Government should also draw attention to these mechanisms.

Thank you for the opportunity to provide a Submission in response to the Paper. Please feel free to contact me should you have any questions.

Carol Bennett
Painaustralia CEO



painaustralia

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