



24 January 2019
Australian Government
Department of Health
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Dear Emeritus Professor Sansom,

Medicines Australia welcomes the opportunity to provide input into the Department of Health's Review of the Quality Use of Medicines (QUM) Program Delivery by NPS MedicineWise (**the Review**).

Medicines Australia strongly supports QUM as part of the National Medicines Policy which includes maintaining a responsible and viable medicines industry in Australia. Our members see themselves as integral to the delivery of QUM, and they are involved in many activities that contribute to effective and appropriate medicine use, for example:

- The provision of educational materials for patients and healthcare professionals
- Supporting ongoing research and development (via the development of new medicines and also via safety monitoring of existing medicines)
- A commitment to abiding by regulatory standards which ensure the ethical and responsible promotion of medicines

As the peak association representing the discovery-driven pharmaceutical industry in Australia, our members have been involved in initiatives that aim to improve QUM including those delivered by NPS MedicineWise. Medicines Australia believes that there are many opportunities for NPS MedicineWise activities to deliver value for money, improve linkages with relevant stakeholders and achieve the QUM outcomes expected of Government, which can be enhanced by the uptake and use of digital health, risk minimisation activities and educational materials.

Medicines Australia members working with VentureWise

Industry members have reported their overall experience of working with NPS MedicineWise (and more specifically VentureWise) as being positive, with requests for support being relevant, timely and well designed, and with appropriate focus. In addition, one member commended them for being open to constructive suggestion and comment on ways to ensure the methodology and findings of their projects were robust, could be built upon, submitted for peer review and ultimately made available to the relevant broader prescribing or healthcare community. This resulted in a number of scientific presentations and publications in peer reviewed journals that should inform policy, medical education and standards of clinical care.

In summary, VentureWise have fulfilled their stated QUM objectives with these projects. The working relationship has been very collaborative and focussed on the QUM goals, and the outputs from these projects have significantly added to the Australian evidence base, whilst providing very specific relevant information to the healthcare providers who were involved in these studies.

Improving digital health literacy amongst consumers

Medicines Australia recognises the important role that NPS MedicineWise plays in developing programs that aim to improve QUM. We also acknowledge the reported impact that key NPS programs have had on prescribers of medicines¹. However, there is little information available on the effectiveness of any NPS programs that are directed towards consumers, and whether these programs genuinely improve consumers' understanding of medicines and help them make better decisions about their medicines and medical tests. Medicines Australia strongly asserts that QUM should not be seen as a mechanism to generate savings, rather an investment in the health and wellbeing of Australians, and evaluation of the effectiveness of QUM programmes should include monitoring health outcomes.

Medicines Australia believes that the NPS could play a greater part in improving consumers' digital and health literacy. Raising consumer understanding and awareness of the availability of accurate and up to date information on medicines is fundamental to QUM. The need for rapid dissemination of accurate and up to date patient information via digital media is becoming increasingly important as patients demand faster access to innovative therapies for complex conditions. Increasing consumer understanding and awareness of the availability of Consumer Medicine Information (CMI) is a key platform for NPS MedicineWise to further improve QUM.

CMIs are readily available electronically at the point of dispense through pharmacists and other healthcare professionals (HCPs) via dispensing and prescribing software, as well as on company and the Therapeutic Goods Administration's (TGA) websites ensuring patients have access to the most accurate and up to date information on their medicine. It is mandatory for all prescription medicines to have a CMI available at point of dispense and a statement is included the outer carton that directs consumers to where they can download the most up to date version.

However, there have been reports that while some consumers are receiving CMI from their HCPs the documents generally remain underutilised². In an article posted on the NPS website, the authors claim that "...uncertainty remains about who should be ensuring it gets to the patient"³. The I-CMI Report found only about two-thirds of consumers were aware of the availability of CMI⁴. An Australian study has suggested that doctors and pharmacists are still a preferred source of a CMI⁵.

¹ NPS Annual Evaluation Report 2016 Executive Summary (<https://cdn0.scrvt.com/08ab3606b0b7a8ea53fd0b40b1c44f86/6a2cc555f4d36679/a91bb3153ead/Annual-Evaluation-Report-2016-Exec-Summary-for-Web-FINAL.pdf>)

² Hamrosi KK, Raynor DK, Aslani P. Enhancing provision of written medicine information in Australia: pharmacist, general practitioner and consumer perceptions of the barriers and facilitators. *BMC Health Serv Res.* 2014;14:183. Published 2014 Apr 23. doi:10.1186/1472-6963-14-183 (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4000453/>)

³ Wells L and Metherell M Consumer medicine information. *Aust Prescr* 2017;40:44-5 (<https://www.nps.org.au/australian-prescriber/articles/consumer-medicine-information-1#article>)

⁴ Investigating Consumer Medicine Information (I-CMI) Project <http://6cpa.com.au/wp-content/uploads/Investigating-Consumer-Medicine-Information-I-CMI-Project-Full-Final-Report-Part-1.pdf>

⁵ Hamrosi KK, Raynor DK, Aslani P. Enhancing provision of written medicine information in Australia: pharmacist, general practitioner and consumer perceptions of the barriers and facilitators. *BMC Health Serv Res.* 2014;14:183. Published 2014 Apr 23. doi:10.1186/1472-6963-14-183 (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4000453/>)

With the Government looking to deliver its National Digital Health Strategy by 2022, Medicines Australia feels it would be entirely apt for the Government (potentially through NPS MedicineWise) to begin developing educational programs that aim to improve digital health literacy amongst consumers. We believe that by improving patients' digital health literacy, they can become more engaged in their health management, more likely to follow their healthcare professionals' advice and be more proactive about their treatment. An important part of any program would be the inclusion of appropriate metrics to help gauge its effectiveness in delivering objectives in line with QUM principles.

Medicines Australia acknowledges that NPS MedicineWise should deliver value for money, improve linkages with relevant stakeholders and achieve QUM outcomes. Activities to achieve this may include:

- Additional therapeutic product Risk Minimisation Activities such as HCP educational booklets, patient leaflets and continuing professional development. These materials could be delivered from a Therapeutic Areas/class effects perspective rather than individual product level.
- Leveraging comprehensive clinical databases to prioritise risk minimisation activities and information. A key challenge in today's information overloaded environment is to ensure only high quality and useful information is delivered to clinicians and patients. Leveraging NPS integrated databases would support the development of this type of highly useful and insightful information.
- Risk Minimisation education materials could be made available by NPS MedicineWise online. These activities would support QUM by supporting prescribers having access at one site all relevant materials (outside of the PI) for prescribing the right drug to the right patient at the right time.
- Supporting implementation of required product risk minimisation activities that are at times mandated by the regulatory agencies, such as Patient Alert Cards, physician checklists.

Conclusion

Medicines Australia believes that NPS MedicineWise has played an important role in ensuring the Quality Use of Medicines in Australia. Medicines Australia contends that it is appropriate to maintain a focus on this critical pillar of the National Medicines Policy. Any future review of the National Medicines Policy should consider opportunities to further enhance QUM, health literacy, compliance, adherence, medication management and improving health outcomes for patients. There are many opportunities for NPS MedicineWise to continue this work, given the challenges and disruptors influencing the Australian health sector, such as an ageing population, health literacy and digital technologies.

If you would like to discuss any aspect of this submission further, please contact Petrina Keogh, Manager Stakeholder Relations, pkeogh@medaus.com.au, or Betsy Anderson-Smith on banderson-smith@medaus.com.au.

Yours sincerely



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