Improve the mental health of communities
About the Royal Australian and New Zealand College of Psychiatrists

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) is responsible for training, educating and representing psychiatrists in Australia and New Zealand. The RANZCP has over 6900 members, including more than 5100 qualified psychiatrists and around 1800 members who are training to qualify as psychiatrists.

Introduction

On 24 March 2021 the Australian Department of Health announced it would conduct a Post-market Review (PMR) of the medicines available under the Pharmaceutical Benefits Scheme (PBS) Opiate Dependence Treatment Program (ODTP) including consideration of patient access and affordability.

The PMR is an opportunity to review the current program arrangements to ensure that Australians who have an opioid dependency continue to have access to medicines to help treat their opioid dependence.

This PMR examines important issues such as barriers to access and the future delivery of opioid dependence treatment.

In line with the established framework for the conduct of a PMR, there is a public consultation process for the draft Terms of Reference (ToR) for the review. The consultation closes on Wednesday, 30 June 2021.

This submission provides a detailed response to the survey questions.
Proposed submission responses to the Draft Terms of Reference for the Post-market Review of Opiate Dependence Treatment Program Medicines

Draft Terms of Reference One

1. Describe and compare essential elements of models of service delivery for opioid dependence treatment (ODT) in Australia (and internationally) including best practice guidelines and current models that support access to ODT medicines through both pharmacy and non-pharmacy settings

The RANZCP has no further comments on Reference One.

Draft Terms of Reference Two

2. Examine the consumer experience, focusing on equity of access and affordability of ODT medicines across the different models of delivery. This will include consideration of access to ODT for at risk population groups including people living in rural and remote areas and Aboriginal and Torres Strait Islander peoples

The RANZCP welcomes the consideration of the consumer experience as there is room for improvement on the long-standing issue of dispensing fees paid by consumers to the dosing service (pharmacy and non-pharmacy) that supervises their medication.

The RANZCP highlights cost is a significant barrier to access as the cost differential between most PBS subsidised medications is $6.60/month for Centrelink payment recipients is affordable in comparison to $150/month in pharmacy dispensing fees for “fully subsidised” ODTP medications.

The RANZCP notes the opportunity to include travel costs to and/or from dosing points. There is a significant cost to accessing medication for opioid use disorder in comparison to other chronic health conditions that have access to subsidised medication in the long-term. The RANZCP suggests consideration be given to the total cost of dosing as experienced by consumers an important factor of the Reference Two.

Draft Terms of Reference Three

3. Explore the utilisation of PBS subsidised ODT medicines in Australia, including funding and costs incurred in the supply and dispensing of Opiate Dependence Treatment Program (ODTP) medicines in pharmacy and non-pharmacy settings. This will include examination of current PBS restriction criteria and the impact of the listing of modified release buprenorphine injections on the PBS ODTP.

The RANZCP would suggest including examination of the impacts of current PBS restriction criteria on the utilisation of opioids for patients that require treatment for both chronic pain and opioid use disorder.
Draft Terms of Reference Four

4. Propose alternative service delivery arrangements for access to ODT medicines, with an aim of identifying an accessible, cost-effective and efficient ODTP for both consumers and the Australian Government

The RANZCP suggests the addition of the words ‘equitable’ and ‘affordable’ to Terms of Reference Four.

Final comments

*Do you have any additional comments or feedback regarding the draft ToR for the ODTP PMR?*

The RANZCP would suggest including examination of the impacts of differences in the current PBS restriction criteria on ODTP medications in comparison to other opioids for chronic pain with particular consideration given to the increasing number of patients with dependence on opioids prescribed for chronic pain who require to transfer from one form of PBS restrictions to the other.

The RANZCP recognises the importance of medical expertise in the evaluation of medicines used for the treatment of substance use problems. The RANZCP would suggest including a medically-trained addiction specialist on the review panel.