

ACMD

Advisory Council on the Misuse of Drugs

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Jeremy Browne, Minister for Crime Prevention
Home Office
2 Marsham Street
London
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13 February 2013

Dear Minister,

Re: Allied Health Practitioners Independent Prescribing

The Advisory Council on the Misuse of Drugs (ACMD) is pleased to provide the advice on the recommendations to extend independent prescribing responsibilities to physiotherapists and chiropodist / podiatrists (allied health professions).

The advice recommends changes to the Misuse of Drugs Regulations 2001 to extend prescribing for Allied Health Professionals, therefore, I am copying this letter to Daniel Poulter, Parliamentary Under Secretary of State for Health.

On the 24th July 2012 the Department of Health Ministers announced agreement to proposals by the Committee on Human Medicines that would allow allied healthcare professionals to prescribe a limited list of controlled drugs (CDs). The ACMD, having responsibility for issues concerning potential misuse and diversion of drugs, has given careful consideration to the proposals. The ACMD has considered issues including, diversion, safeguards and competency of prescribers. Following its consideration the ACMD supports in principal the proposal to allow physiotherapists and chiropodists /podiatrists to prescribe a limited list of controlled drugs (totalling 7 and 5 respectively) as outlined in annex 1.

Furthermore, the ACMD recommends that the Misuse of Drugs Regulations 2001 (as amended) is amended to allow physiotherapists to prescribe a total of 7 controlled drugs as specified in annex 1 (table 1) and that chiropodists /podiatrists are allowed to prescribe 5 controlled drugs as specified in annex 1 (table 2).

In doing this the ACMD does have some remaining concerns that it seeks assurance on from the Department of Health:-

- In relation to the safe use of the more potent opioids, morphine and fentanyl, the ACMD seeks assurance from the Department of Health, that there will be safeguards that ensure that patients will not be put at risk by this extension of prescribing provisions.
- On 'single practitioners' (i.e. where no medical doctor is present on site, NHS or otherwise) the ACMD seeks assurance on how these practitioners would address potential adverse reactions, for example respiratory depression in patients following administration of any medications on the limited list.
- Patient allergy to certain medications should be well documented to minimise adverse reactions.

The ACMD's view is that initiation of prescribing for pain management, subsequent medication review, dose change and dose escalation for patients with chronic pain conditions in both primary care and clinic settings are all decisions which should continue to be taken carefully, in the context of a multidisciplinary approach and with a strong audit trail of evidence of patient need and patient benefit versus risk. The proposed extension of independent prescribing should not deviate from these broad principals.

The ACMD would also like to see the continuation of measures to ensure that physiotherapist and chiropodist /podiatrist prescribers do not prescribe outside their competence and assurance that a framework is in place to identify atypical patterns of prescribing that may indicate this is occurring.

The ACMD's firm view is that the private sector provision for independent prescribing by physiotherapists and chiropodists /podiatrists needs to ensure that the safeguards are the same as those in place in the public sector (NHS). Particularly important is the free-flow of information (e.g. between GPs/consultants and physiotherapists and chiropodists /podiatrists) to address potential diversion or abuse of controlled drugs and to detect any malpractice.

The ACMD recommends that the Department of Health undertake a follow up review of the provisions to evaluate whether the extension of independent prescribing of a limited list of CDs to physiotherapists and chiropodists /podiatrists has the desired impact of benefit to patients and care pathways.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Les Iversen', written in a cursive style.

Professor Les Iversen FRS CBE

Cc: Daniel Poulter, Parliamentary Under Secretary of State for Health

Annex 1 – Proposed list of Controlled Drugs (CDs) for independent prescribing by physiotherapists and chiropodists /podiatrists

Table 1 - Physiotherapists

| <u>Controlled Drug</u> | <u>Route</u> |
|------------------------|-------------------|
| 1. Temazepam | Oral |
| 2. Lorazepam | Oral |
| 3. Diazepam | Oral |
| 4. Dihydrocodeine | Oral |
| 5. Morphine | Oral & injectable |
| 6. Fentanyl | Transdermal |
| 7. Oxycodone | Oral |

Table 2 – Chiropodists/Podiatrists

| <u>Controlled Drug</u> | <u>Route</u> |
|------------------------|--------------|
| Temazepam | Oral |
| Lorazepam | Oral |
| Diazepam | Oral |
| Dihydrocodeine | Oral |