Use of digital images for supply of medicines during COVID-19 telehealth arrangements

Background
To facilitate supply of medicines prescribed during telehealth consultations, development and approval of secure electronic prescribing systems was fast-tracked during 2020.

All widely available electronic prescribing and dispensing software systems are approved for use in Western Australia. This means most community based prescribers and pharmacies are able to issue and dispense electronic prescriptions.

The interim measure to allow use of ‘digital images’ of paper-based prescriptions, which was introduced to support telehealth arrangements in March 2020, will continue until 31 March 2022.

The formal authorisation allowing the use of digital images of prescriptions is available on the WA Government website with other health related directions relating to COVID-19.

Interim Arrangements - Prescribers
Prescribers can create a paper prescription during a telehealth consultation. The prescription must contain all information usually required and be signed by the prescriber. Paper-based prescriptions generated on a computer must be printed out and then signed by the prescriber. A digital signature cannot be used on a paper prescription.

The prescriber may then either:
- fax a copy to the patient’s pharmacy of choice, or
- create a clear image of the entire prescription (such as a photo or scan) including the barcode (if applicable), and email or text to the patient’s pharmacy of choice.

For Schedule 4 (S4, prescription only) medicines, the prescriber must keep a copy of the prescription in their records for a period of 2 years.

For medicines in Schedule 8 (S8, controlled drugs), the prescriber must dispatch the original paper prescription, by post or courier, to the pharmacy to which the digital image was sent. Prescriptions must be dispatched within five working days. The prescription should be marked, by the prescriber, to indicate that it is a conformation of an immediate request to supply on a digital image.

Digital images and original prescriptions should be sent directly to a pharmacy and must not be provided to patients.

The prescriber must send the original paper S8 prescription to the dispensing pharmacy. It is not the pharmacy’s role to obtain the original S8 prescription from the prescriber.
Interim Arrangements - Pharmacists
Pharmacists may immediately supply a S4 or S8 medicine on receipt of a digital image issued and sent by an authorised prescriber. Pharmacists may supply to a patient (or their agent) in person or via home delivery, in accordance with usual practice standards.

All usual dispensing records should be made, and normal labelling and supply regulations continue to apply.

For a S4 medicine, the pharmacist must keep a copy of the digital image or fax, received from the prescriber, for a period of two years.

If the prescription contains repeats, then a repeat form must be generated and attached to a hard copy of the digital image. All repeats of this type must be retained at the original dispensing pharmacy. Repeats may not be returned to the patient or transferred to another pharmacy.

Deferred supply should be managed as for repeats, using the usual PBS processes for deferrals.

For S8 medicines, prescriptions must be valid and comply with the regulations in full. Pharmacists should still take adequate steps to verify the legitimacy and authenticity of the prescription, prescriber and patient (and, if applicable, the patient’s agent). The Department has detected use of fraudulent emails to send copies of prescriptions to pharmacies.

For prescriptions for S8 medicine, pharmacists must keep a copy of the digital image or fax until the original prescription is received.

If the original prescription is not received within ten working days, the pharmacist is to notify the Department of Health.

PBS Claiming Arrangements
Digital image arrangements are also permitted under PBS rules until 31 March 2022.

Pharmacists may dispense and claim PBS items from a digital image of a prescription sent through by the prescriber.

Patients are not required to sign to acknowledge receipt of PBS supply, if it is not practical for them to do so.

The PBS website should be consulted for more information on arrangements for PBS authority items and other matters.

Both State and PBS arrangements apply to all community prescribers and pharmacies in Western Australia, and to hospital prescribers and pharmacies for outpatient supply.

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