

31 May 2023

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By email: ██████████

Subject: Correspondence regarding QScript

Dear ██████

Thank you for your letter of 18 May 2023 providing an update on QScript issues, including recent audits and the status of the QScript Review.

As you are aware, AMA Queensland remains committed to supporting QScript to reduce harms to Queenslanders from inappropriate use or access to monitored medicines. It is an important reform and a worthwhile initiative of the Queensland Government.

We remain concerned, however, about its implementation and doctors continue to raise issues about the usability of the platform. There are also several aspects of your recent letter that we wish to raise, as follows:

- Intent to continue with individual practitioner audits

We are concerned that audit notices will still be sent to practitioners even though individual audits of non-compliance will not be provided. Whilst we note the Department's advice that audit notices will now not be sent until the QScript system identifies at least 11 instances of potential non-compliance to 'account for occasions when QScript functionality issues prevented prescribers from checking QScript', we view this as insufficient.

Doctors were distressed at receiving audit notices sent in February 2023 which was exacerbated by the fact they were not advised when or for which patients they allegedly breached the regulations. This meant they could not review their own records, confirm the non-compliance and make appropriate practice adjustments.

The implication in the letter that the Department intends to deny providing such advice to practitioners who receive audit notices in future, even where the practitioner requests this advice, will only serve to cause further stress and alienate doctors who, on the whole, support the intent of QScript.

AMA Queensland recommends that, if the Department is intending not to advise individual practitioners of the specific details of alleged non-compliance, that it does not send audit notices to individual practitioners and instead takes an educational approach. For example, we suggest the MMU send QScript updates detailing overall rates of non-compliance to all QScript users, rather than emailing individual practitioners and continuing to cause unnecessary distress.

- Technical, legal, contractual and funding constraints preventing improvements

The letter states Queensland Health may be prevented from making improvements to QScript because of contractual and other constraints. AMA Queensland is concerned that this implies problems with the platform may never be rectified. We ask Queensland Health confirm this implication.

Further, we are concerned that, despite this inability, the Department recommends compliance activities continue and that practitioners who breach the regulations because of technical difficulties inherent in the platform be left to simply rely on the reasonable excuse provision in the legislation. This is unjust and we request Queensland Health revise this recommendation.

- QScript data demonstrates compliance emails did not have any impact on compliance

The graphs provided in the document 'QScript Update May 2023' show that the compliance emails sent by Queensland Health to practitioners in February 2023 did not have any impact on the rate of compliance. In fact, the data presented shows:

- QScript registrations have continued to decline since the emails were sent.
 - The data shows that the events that resulted in spikes in registration included the opening of registrations, the date upon which QScript checks became mandatory and the commencement of QScript.
 - Conversely, there was no increase in registrations following the compliance emails and registrations continued to decline following.
 - This indicates practitioners voluntarily comply with key milestone events for the regime and compliance emails have no effect (other than causing practitioner distress).
- QScript patient searches began to taper when the compliance emails were sent and actually declined soon after.
 - This again shows the emails had no effect on compliance.
- QScript patient profile views rapidly declined after the compliance emails were sent.
 - This indicates the compliance emails may have had a negative effect, if any, on practitioner compliance.
- The number of instances where practitioners didn't look up between 1-10 patients actually increased after the compliance emails were sent, seemingly in direct proportion to the decline in the number of instances that practitioners didn't look up more than 11 patients.

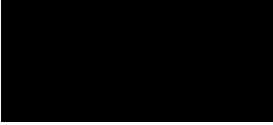
Given Queensland Health's data indicates the compliance emails did not effect a positive change in practitioner behaviour, AMA Queensland urges Queensland Health to take a universal educational approach to compliance, rather than targeting individual practitioners. Continued use of the compliance emails will only cause further distress without any compliance benefit.

- Timeframe for QScript review outcomes

The letter states the outcomes of the consultation on QScript and Monitored Medicines Standard requirements will be provided 'when available'. AMA Queensland members continue to raise the need for an exemption for inpatients, in both hospital and residential aged care settings. As such, we would be grateful for any anticipated timeframe you can provide so we can update members.

We reiterate AMA Queensland's firm commitment to supporting QScript as a vital mechanism to improve protections for patients and the community from the harms associated with monitored medicines. We would welcome an opportunity to meet with you to discuss practical solutions to these issues further.

Yours sincerely



Dr Brett Dale
Chief Executive Officer
AMA Queensland