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Dear Dr Weekes

I am writing in response to your invitation for submissions to the National Prescribing Service (NPS) Prescribing Competencies Project.

As requested, the AMA has provided track-changes to the NPS draft document supplied. In addition, we would also like to make some more general comments in response to the draft.

### **Precrifer Training**

It is the AMA's view that prescribers of medicines must be adequately trained in organic and inorganic chemistry, physiology, biochemistry, and anatomy. Only after completing an educational program that offers this level of core training, would a health practitioner meet the competency requirements to prescribe.

Currently, only medical practitioners receive this level of training.

Additionally, from our knowledge of education and training programs only medical practitioners would fully meet Performance Criteria 3.6.1 *Synthesises information obtained from the comprehensive assessment, investigations and diagnostic tests and establishes a diagnosis.*

### **Scope of Practice**

The framework should place greater emphasis on:

- practitioners prescribing within their scope of practice;
- being competent in using knowledge and making judgments on when not to prescribe;
- referring a person to another health professional when that person's clinical condition is outside scope of practice; and
- referring a person to a medical practitioner if they fail to improve within a specified period of time.

### **Conflict of Interest**

It should also be a requirement that prescribing and dispensing must be kept separate to reduce the inherent conflict of interest. However, under the broad definition of medicine contained in the draft framework, it is possible that some non-medical

health practitioners will be 'prescribing' and dispensing, e.g. Chinese medicine practitioners and herbal medicines.

**Effective Communication**

It is an essential core competency for practice in Australia, and critical to the quality use of medicines, that a prescriber can communicate in English.

Please contact us if you would like us to expand on any issues raised or have any questions. In the first instance, contact Georgia Morris on 02 6270 5466 or [gmmorris@ama.com.au](mailto:gmmorris@ama.com.au).

We look forward to further involvement during the latter stages of your project, and to receiving the second draft framework for comment in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Geoff Dobb', with a stylized flourish at the end.

Professor Geoff Dobb  
Chair  
AMA Therapeutics Committee

17 February 2012