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Circular 016/17 05 May 2017.

Dear Pharmacist,

I refer to previous communications in relation to Phased Dispensing and in particular to Circular 013/17.

Please find attached some FAQs that have been developed to assist you with the new Phased Dispensing Application that you will find on the Pharmacy Application Suite. We are also providing you with some screen shots of the system to enable you to navigate the system smoothly.

A copy of the HSE Pharmacists contact details in the local areas is enclosed for ease of reference when you wish to register an appeal to a negative decision by PCRS to authorise a phased dispensing application.

Thank you for your cooperation on this matter.

Yours sincerely,

Anne Marie Hoey,

Que Marie Story

Primary Care Reimbursement & Eligibility.



Circular 016/17 05 May 2017.

FAQs for Phased Dispensing Validation

Q 1. What is meant by Newly Initiated Patients?

A. 'Newly Initiated' patients are those patients for whom a phased dispensing claim has not been submitted by the particular pharmacy previously. Where it is the intent to claim using Reason 1, a copy of the relevant prescription must be uploaded each month.

Where it is the intent to claim using Reason 4, the full details of the pharmacist determination that the patient should not have the full month's requirement in their possession on a single dispensing should be explicit in the application process. Such authorisations when provided will be either for 6 months, two years or lifelong.

Q 2. Circular 013/17 states that "patients for whom phased dispensing claims have been submitted will continue to be honoured. A pharmacy in common ownership with ours has been submitting phased dispensing claims for a patient for some months who now wishes to attend a different pharmacy within our pharmacy group." Do I need to submit a request for authorisation?

A. Yes. Approvals are made at the level of the individual pharmacy.

- Q 3. Do I need to complete all the confirmations in submitting my application for phased dispensing authorisation?
- A. Where the confirmations apply to the patient, ticking the relevant boxes will expedite the approval process.
- Q 4. Can I check those patients for whom I already submit phased dispensing claims to check that no problems will arise in future?
- A. No. The HSE is concentrating on newly initiated patients in the initial months. After that, specific pharmacies will be requested to submit their patients for continued approval. It is our intention to provide a list of patients (by GMS number) to the pharmacy in the last week of the month.

We have agreed in recent days that such notification will be provided to specific pharmacies before the end of a month for presentation to the HSE in the following month before the following month's phased dispensing claims are submitted.

Q 5. When I receive authorisation from the HSE for phased dispensing claims for a newly initiated patient, what does that mean?

A. It means that the pharmacy can submit a claim for phased dispensing for a patient so long as the patient is supplied with their instalments of medicine on multiple supply occasions. When either the pharmacy determines, or the patient requests, to have their medicine supplied on a single supply occasion, then phased dispensing claims can no longer be validly submitted by the pharmacy. Therefore, it is important for audit purposes that supporting documentation can be provided to the HSE on request or during inspections to substantiate such supply to include the dates of each multiple supply occasion.

Q 6. What kind of supporting documentation is acceptable to substantiate multiple supply occasions?

A. Some vendor systems offer more visibility than others in this regard. Where Patient Medication Records (PMR) outlining instalments on different supply dates cannot be produced by the pharmacy computer system, it would be very important for a pharmacy to ensure that signed patient collection records against dates of supply can be produced on request by the HSE.

Q 7. My patients want to continue using a Monitored Dosage System (MDS) but do not want to collect their medications on multiple supply occasions. What do I do?

A. It remains open to individual pharmacies to offer such a service as a quality service to their patients but it is not a HSE reimbursed service and phased fee claims cannot be submitted unless supplies have occurred over multiple supply occasions.

Previously, a funding proposal was submitted to the Department of Health by the Irish Pharmaceutical Union (IPU) but was not accepted by the Department of Health.

No exceptions will be made under any circumstances, to circumvent the operative rules of phased dispensing.

Q 8. The Doctor has written phased dispensing on the prescription. Has this to be written by the doctor each month on the prescription?

A. Yes. It must be written on the prescription each month unless the GP enrols the patient through the GP Application Suite for ongoing phased dispensing services. If the patient is elderly, when enrolled through the GP Application Suite, such approval would then be lifelong.

Circular 47/16 to GPs in 2016 states "In circumstances where the prescribing GP deems that a patient should not be issued with the full supply of medication on a single dispensing occasion the GP should exercise their independent clinical judgement and in such cases, write 'Phased Dispensing' on the GMS prescription." The HSE will accept computer generated instructions such as 'Phased Dispensing' or 'Dispense Weekly' on the face of the prescription. A stamp is not sufficient.

Q 9. The circular asks for a copy of the prescription to be scanned to the HSE. My pharmacy does not have scanning facilities. Can I fax the prescription?

A. No. The HSE is anxious to retain an auditable trail for phased dispensing authorisations. Circular 13/17 refers to a photograph also being acceptable which can be uploaded through the secure portal.

In any communication with patient details provided, secure email should be used and if a pharmacy is not satisfied that their current email facilities are secure enough, Healthmail offers a solution in this regard.

A. For the purposes of the phased dispensing validation, it is those drugs which are Psycholeptics (ATC Level N05) and Psychoanaleptics (ATC Level N06). The HSE will place such a list on the HSE website to provide clarity in this regard.

Q 11. I have some patients whose claims are submitted using a generic service number. Will these claims be paid?

A. Yes. Such claims will be recognised for the next three months as historical phased patients. However, it is important to note that the HSE has conducted significant analysis on historical claims and have developed tracking mechanisms to identify pharmacies whose claims may rise unexpectedly. If such circumstances arise for your pharmacy, you will be asked to provide PMR evidence of claims against named individuals for whom dosage instructions, to satisfy prescription legislation requirements, have to be labelled appropriately.

After three months, such claims will be reviewed and you may be asked prospectively to provide on an individual basis: Name, Address and Date of Birth to substantiate claims. However, if claims against these numbers remain within expected norms, we may extend the arrangement for six months.

Q 12. What about European Economic Area (EEA) claims?

A. Applications can only be processed for patients holding valid Medical Card Numbers.

Q 13. Can I submit a claim for a patient in a Nursing Home?

A. No. Phased dispensing claims will not be paid where nursing supervision is available at a patient's residential setting (Ref: Circular 013/17).

Q 14. I applied for phased dispensing authorisation which was not approved. Will I be told the reason why?

A. It is not our intention to give individual reasons for not approving applications other than to highlight that each negative decision will have been reviewed by a HSE Pharmacist within PCRS before communication to your pharmacy. In other words, an unfavourable decision means that a HSE Pharmacist has not agreed with your assessment of need. The quickest method of having such a determination reconsidered is for the patient's GP to enrol the patient for phased dispensing, in which circumstance, it will be automatically approved.

Please ensure that any contributory factors in your determination that the patient could not safely be in possession of the full month's medication requirements on a single dispensing occasion are outlined in the free text section of the application. Such contributory factors might encompass a registered disability.

Appeals can be made to the local HSE Pharmacist for the area in which the pharmacy is located. This must be in the prescribed format that the HSE pharmacist dispatches to you when you email your intention to register an appeal using your application reference number. All communication must be online to provide an auditable record of applications and appeals where they arise.

- Q 15. Where PCRS does not approve a phased dispensing service and I still consider that the patient requires the service, what can I do?
- A. (i) If the patient's GP considers it is appropriate they can register the patient for phased dispensing online
 - (ii) You can appeal this decision by providing additional information to the HSE Pharmacist in your area.
- Q 16. What type of additional information should I provide to my local HSE Pharmacist?
- A. You should provide as much relevant information on the patient's particular circumstances as possible and give details of the reasons you consider phased dispensing is required.



Primary Care Reimbursement Service

Phased Dispensing Application System
User Manual

Version 1.0

Table of Contents

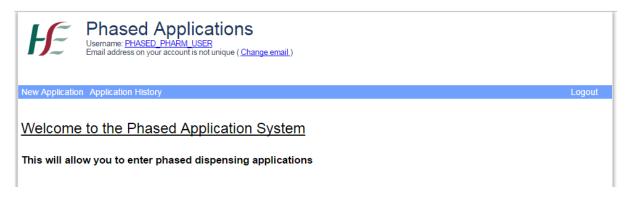
		Page Number
1.	How to enter the Phased Dispensing Application System	3
2.	Entering a Phased Dispensing Claim under Reason 1	5
3.	Entering a Phased Dispensing Claim under Reason 4	6
4.	Viewing the Application History	8

1. How to enter the Phased Dispensing Application System

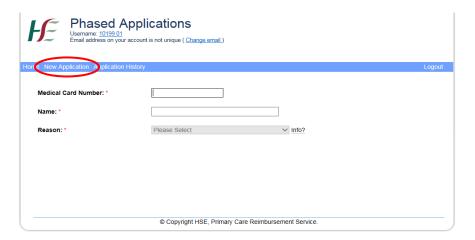
The Phased Applications System is found in the Pharmacy Application suite under **Claiming> Phased Dispensing.**



Click on '**Phased Dispensing**' to enter the homepage. This screen will allow you to enter Phased Applications.



Enter 'New Application' from the task bar menu. You will be directed to the following page;



A valid medical card must be entered and this will populate the patient name.

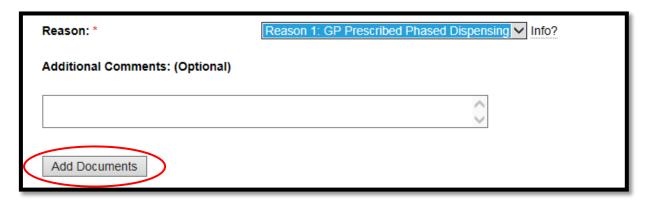
Reason 1 or 4 must be selected.

- Reason 1: GP Prescribed Phased Dispensing or
- Reason 4: Exceptional Circumstances

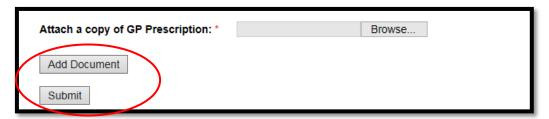
2. Entering a Phased Dispensing Claim under Reason 1

When **Reason 1** is selected the application will allow a copy of the prescription to be uploaded. A facility to provide '**Additional Comments**' is also provided.

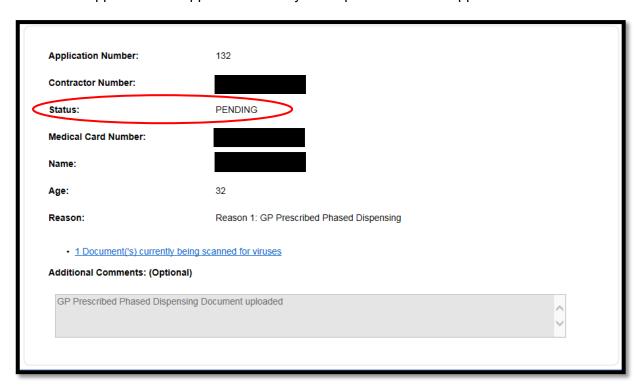
Click 'Add Documents' tab.



Attach a copy of the GP Prescription and click 'Add Document'. Once the prescription has been uploaded, the facility arises to allow for additional documents (e.g. mental health services prescription). Click 'Submit'.



A confirmation screen will appear. The application status will be 'Pending' until reviewed by PCRS and will appear in the 'Application History' in sequential order of application number.

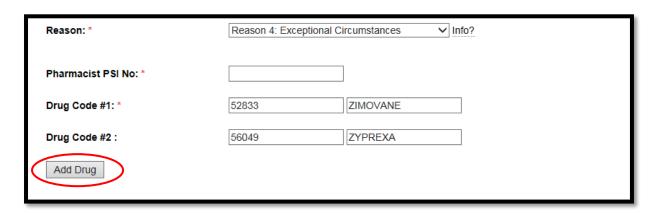


3. Entering a Phased Dispensing Claim under Reason 4

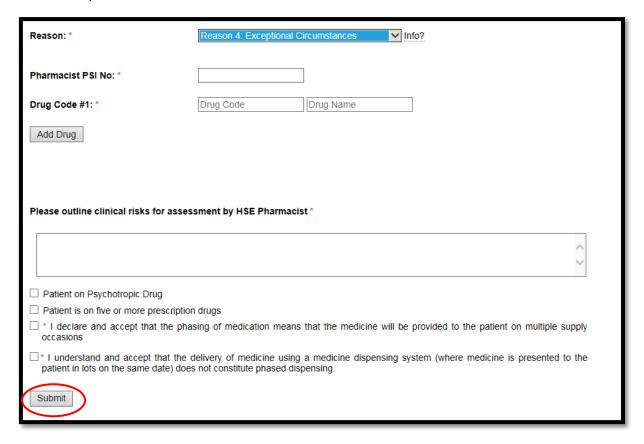
When **Reason 4** is selected, the application will allow the patient medicines to be entered by GMS drug code. The drug code will populate the drug name. Invalid drug codes will appear as 'Not Found'.

Note: To enable the application, all psychotropic drugs that the patient is prescribed should be inserted in the list of drug codes.

To enter additional drugs click the 'Add Drug' tab. At least one GMS drug code must be entered.



Fields marked with * are mandatory and the application will not proceed if these areas have not been completed. Once the fields have been entered, click 'Submit'.



A confirmation screen will appear once the application has been submitted.

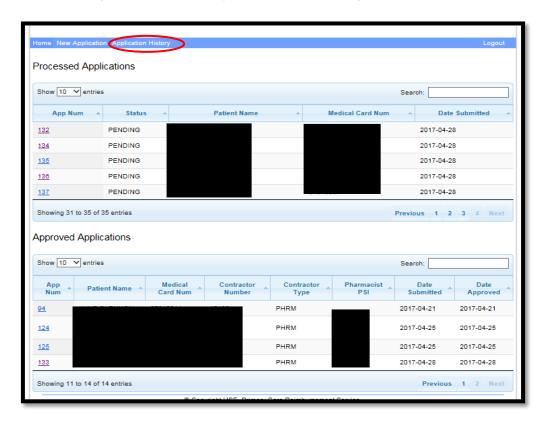


The application status will be 'Pending' until reviewed by PCRS and will appear in the 'Application History' in sequential order of application number.

4. Viewing the Application History

Click 'Application History' in the toolbar menu. Here the list of 'Processed Applications' with status and 'Approved Applications' can be viewed.

Pharmacies will be able to view and download the documents or comments they submitted. Pharmacies will only be able to view applications which they made.



HSE PHARMACISTS IN THE AREAS

Health Service Area	Primary Care / Community Care Pharmacist	Address	Telephone	Fax	Email Address
CHO 6 / 7 / 9	Laura Nyhan	Health Service Executive Block B The Civic Centre Main Street BRAY Co Wicklow	01 274 4249	01 274 4289	laura.nyhan@hse.ie
СНО 3	Appointment pending	Primary Care Unit HSE –West Ballycummin Avenue Raheen Business Park LIMERICK	061 464 002	061 464 271	
CHO 4	Louise Creed	HSE South Block 15, Saint Finbarr's Hospital Douglas Road CORK	021 492 3821	021 492 3820	louise.creed@hse.ie
CHO 2	Nuala Prendeville	Primary Care Unit Merlin Park Hospital GALWAY	091 775 674	091 770 326	nuala.prendeville@hse.ie
CHO 8 / 1	Joanne O'Brien	Primary Care Unit Railway street NAVAN Co Meath	046 907 6435	046 907 1052	joannep.obrien@hse.ie
CHO 5	Mel Cox	Primary Care Unit Lacken Dublin Rd KILKENNY	056 778 4158	056 778 4391	mel.cox@hse.ie
CHO 8	Pat Murphy	Primary Care Centre, Connolly St., MOUNTMELLICK Co. Laois	057 869 7500	057 869 7522	pat.murphy@hse.ie
CHO 1	Trevor Hunter	Health Service Executive Primary Care Development Unit JFK House JFK Parade SLIGO	071 913 5031	071 913 5027	TrevorA.Hunter@hse.ie