



Feidhmeannacht na Seirbhíse Sláinte
Health Service Executive

Feidhmeannacht na Seirbhíse Sláinte
Seirbhís Aisioca Príomhchúraim
Bealach amach 5 an M50
An Bóthar Thuaidh
Fionnghlas
Baile Átha Cliath 11

Health Service Executive
Primary Care Reimbursement Service
Exit 5, M50
North Road
Finglas
Dublin 11

Guthán: (01) 864 7100
Facs: (01) 834 3589

Tel: (01) 864 7100
Fax: (01) 834 3589

Circular No 021/13

1 October 2013

Dear Pharmacist,

On 24 June 2013, the Minister for Health signed the Commencement Order for the Health (Pricing and Supply of Medical Goods) Act 2013. In line with the new legislation, reference price reimbursement will commence in respect of claims for interchangeable Atorvastatin products dispensed by Community Pharmacists from 1 November 2013 and submitted to the HSE in December 2013.

Below are the reference prices for the first four groups of interchangeable medicinal products published by the Irish Medicines Board (IMB) on 7 August 2013.

Strength	Price per 28 tabs	Price per tab	Price per 30 tabs	Price per 100 tabs
10mg	€3.47	€0.1239	€3.72	€12.39
20mg	€5.46	€0.1950	€5.85	€19.50
40mg	€9.14	€0.3264	€9.79	€32.64
80mg	€10.53	€0.3761	€11.28	€37.61

From 1 November 2013, the HSE will reimburse the notified reference price for the relevant interchangeable products unless informed by the Pharmacist that the GP has stated 'Do not substitute' (Clinical Exemption) in his/her own handwriting on any prescription presented for dispensing for any of the products in the interchangeable groups. The HSE has agreed with the IPU and your software vendors the mechanics for how this information is delivered to the HSE.

Where a product is prescribed that is within one of the groups of interchangeable medicinal products, having completed the dispensing function, Pharmacists are asked to notify the HSE how the Medical Practitioner has prescribed by confirming one of the following:

- a) INN Prescribed
- b) Branded Generic Prescribed
- c) Proprietary Prescribed
- d) 'Do Not Substitute' written by the Prescriber.

If a patient presents a Non GMS prescription where the prescriber has written 'Do Not Substitute' (Clinical Exemption) it is important for the pharmacy to ensure that a photocopy is retained so it can be made available to the PCRS as necessary to validate any claim for extra costs arising.

The HSE has developed patient information leaflets which will be circulated prior to the end of October 2013, which we anticipate will assist patients in understanding generic substitution and reference pricing. The HSE asks for your cooperation in providing these to your patients when they are prescribed one of the products within the interchangeable groups previously published by the IMB.

Your cooperation in ensuring a smooth transition for patients is requested.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Patrick Burke', with a long horizontal flourish extending to the right.

Patrick Burke
Primary Care Reimbursement Service

Appendix – Frequently Asked Questions

Q. What will I be paid?

A. You will be paid the notified reference price unless you provide the information in the agreed manner that the GP has written ‘Do Not Substitute’.

Q. What happens if I cannot buy the product at the HSE price?

A. It is clear from existing intelligence in the market place that the price point determined by the HSE enables product to be procured at a reference price.

Q. What happens when the patient will not accept a generic substitution?

A. Where the patient will not accept a generic substitution, they are required to pay the difference between the reference price and the price of the medicine they want, unless the prescriber has invoked the clinical exemption and written ‘Do Not Substitute’.

Q. How often can I expect interchangeable groups to be published?

A. The Department of Health has determined a list of priority medicines for interchangeability status, which the IMB is assessing and they expect to complete their assessment of these medicines by May 2014. Further information can be found on the IMB website at: <http://www.imb.ie/EN/Human-Medicines/Generic-and-Interchangeable-Medicines.aspx>

Q. How long will it be between publication of groups of interchangeable medicinal products and determination of further reference prices?

A. It will be at least two months to satisfy the requirements of consultation and notification outlined in the legislation.

Q. What do I do if a GP requisitions Lipitor in Dispensing Doctor Stock Orders?

A. Only interchangeable products that are at the reference price can be supplied on Dispensing Doctor Stock Orders. Where the GP does not wish the patient to use a generic product, and the proprietary product cannot be procured at the reference price, a prescription should be written and provided to the patient to present in a pharmacy. The prescriber must invoke the clinical exemption and write ‘Do Not Substitute’.

Q. Can ‘Do Not Substitute’ be written on GMS repeat prescriptions?

A. Yes. Where the GP intends to invoke ‘Do Not Substitute’ for a GMS patient on long term medication, it should be written on the top copy of the three month prescription. The Pharmacist confirmation that ‘Do Not Substitute’ has been invoked will have to be provided at each dispensing.

Q. Does reference pricing / Generic Substitution apply to Registered Nurse Practitioners?

A. Yes.