



*Nurse Practitioners  
New Zealand*

***Nurse Practitioners New Zealand***

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**Feedback on:**

**Changes to the Pharmaceutical Schedule Rules**

Feedback To:           Pharmac

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Nurse Practitioners New Zealand (NPNZ) would like to thank you for this opportunity to submit on the Changes to the Pharmaceutical Schedule Rules. We are fully supportive in the attempt to have the Schedule Rules in one place and for that guidance to be clear and concise, especially in regards to prescriber roles and responsibilities.

Overall, we are in agreement with the intent to publish online only. This would facilitate easier access and easier modification needed in future. We are also in agreement with the removal of the contractual and legislative obligations from the rules as this adds unneeded complexity.

We do agree that these proposed changes are clearer, although there are still some further opportunities for clarity.

Our specific concerns relate to clarity around the definition and understanding of 'specialist' prescribing.

1. In relation to Part 2-Access Criteria, there is concern among our members for the definition of a "specialist" and how this is determined. Many Nurse Practitioners are working in 'specialist' areas of practice. For example, Nurse Practitioners practice in Adult and Paediatric cardiology practices and have specialist knowledge from that area of practice. Nurse Practitioners practice in gastroenterology practice specialising in the treatment of Hepatitis C and Hepatitis B, regularly prescribing the treatments in these areas.
2. Nursing Council have not yet determined a criteria for specialist practice and therefore NP's do not have a mechanism to be 'vocationally' registered as specialists. While there may be some need for this to be clarified in future, we believe for the purposes of prescribing specialist medication, the responsibility is on the prescriber to determine competence in the relevant area of practice.

To avoid misunderstanding of 'specialist' practice, and to avoid unhelpful barriers to appropriate patient care, we would recommend that term "Specialist" be modified in Part 10 to the following : (The highlighted paragraphs have modified wording)

**"Specialist" in relation to a Prescription, means a Doctor or Nurse Practitioner who satisfies any of the criteria set out in the paragraphs below:**

**a. the Doctor is vocationally registered in accordance with the criteria set out by the Medical Council of New Zealand and the Health Practitioners Competence Assurance Act 2003 and has written the Prescription in the course of practising in that area of medicine;**

**b. the Doctor is recognised by the Ministry of Health as a Specialist for the purposes of this Schedule and who has written that Prescription in the course of practising in that area of competency; or**

**c. the Doctor or Nurse Practitioner is recognised by the Ministry of Health as a Specialist in relation to a particular area of medicine for the purpose of writing Prescriptions and has written the Prescription in the course of practising in that area of competency;**

**d. the Doctor or Nurse Practitioner writes the prescription on DHB/Practice stationery and is appropriately authorised by the relevant DHB to do so.**

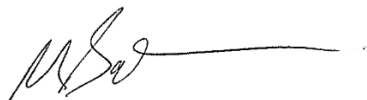
**“Specialist”, in relation to a Specialist recommendation requirement, means a Doctor who satisfies any of the criteria set out in the paragraphs below:**

**a. the Doctor is vocationally registered in accordance with the criteria set out by the Medical Council of New Zealand and the Health Practitioners Competence Assurance Act 2003 and has written the Prescription in the course of practising in that area of medicine;**

**b. the Doctor is recognised by the Ministry of Health as a Specialist for the purposes of this Schedule and has written that Prescription in the course of practising in that area of competency; or**

**c. the Doctor is recognised by the Ministry of Health as a Specialist in relation to a particular area of medicine for the purpose of writing Prescriptions and has written the Prescription in the course of their employment by a DHB and while practising in that area of competency**

**d. A Nurse Practitioner has written the prescription in the course of practicing in the area of expertise for that prescription. The Nurse Practitioner has demonstrated competence in relation to that area of specialisation, and is suitably employed in a speciality practice.**



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Chairperson NPNZ