Queensland Government

Queensland Health

Enquiries to:
A/Executive Director
Healthcare Regulation Branch
Telephone:
File Ref: C-ECTF-23/9805

Senator Janet Rice
Chair of the Senate Community Affairs References Committee
Australian Senate
PO Box 6100 Parliament House
CANBERRA ACT 2600

Email: community.affairs.sen@aph.gov.au

Dear Senator Rice

Thank you for your letter to Mr Michael Walsh, Acting Director-General, Queensland Health dated 3 August 2023, regarding the current Senate inquiry into the assessment and support services for people with attention-deficit hyperactivity disorder (ADHD) and the opportunity to provide the committee with information about this process in Queensland. The Director-General has asked that I respond directly to you on this occasion.

In Queensland, the *Medicines and Poisons Act 2019* (MPA) and the Medicines and Poisons (Medicines) Regulation 2021 (MPMR) provide the regulatory framework for prescribing amfetamines and methylphenidate (psychostimulants). These medicines are 'restricted medicines', 'high-risk medicines', 'diversion-risk medicines' and 'monitored medicines' under Schedule 2 of the MPMR. Under section 30 of the MPA, a person may be authorised to carry out a 'regulated activity' (which includes prescribing) with a 'regulated substance' (which includes amfetamines and methylphenidate) if they are an 'approved person' (such as a medical practitioner) or if they hold a prescribing approval.

Queensland adopts the *Therapeutic Goods Act 1989 (Cwlth)* and the Poisons Standard. Amfetamines and methylphenidate are Schedule 8 medicines in the Poisons Standard and on this basis, they are able to be prescribed in Queensland subject to Queensland regulations. The MPA and the MPMR were developed in recent years and were subject to an extensive consultation process; the regulatory framework around amfetamines and methylphenidate were part of this consultation process. For further information about the policy implementation for amfetamines and methylphenidate please see the relevant factsheet, Prescribing amfetamines and methylphenidate (psychostimulants) at https://www.health.qld.gov.au/__data/assets/pdf_file/0021/1160391/fs-prescribing-psychostimulants.pdf

Medical practitioners and nurse practitioners are able to apply to the department on behalf of their patients for an approval to continue prescribing amfetamines and/or methylphenidate once the diagnosis of ADHD has been made by a relevant specialist (i.e. a psychiatrist, and in some cases a paediatrician). It should be noted that approvals are not required for:

- children between the ages of 4 and 17 years—in Queensland, medical practitioners are not required to hold an approval for children diagnosed with ADHD and some other conditions such as narcolepsy and brain damage.

- psychiatrists in Queensland that prescribe within the 'maximum dosage' as per Schedule 6 Part 2, Division 16 of the MPMR do not require an approval. A prescribing approval from the department is only required when the maximum dose is exceeded. The maximum dose stipulated in the regulation is:
  (a) if the medicine is dexamfetamine—a dose of the medicine that does not exceed 40mg a day; or
  (b) if the medicine is lisdexamfetamine—a dose of the medicine that does not exceed 70mg a day; or
  (c) if the medicine is methylphenidate—a dose of the medicine that does not exceed 80mg a day

The following relates to clinical review processes within public sector mental health services and are not a legislated Queensland Health requirement.

In alignment with the National Safety and Quality Health Service Standards (NSQHSS, 2nd ed., 2017), the care review process occurs as part of the provision of comprehensive care within Queensland public Mental Health and Other Drug Services (MHAOD). Standard 5 of the NSQHSS, the Comprehensive Care Standard, informs guidance for Queensland public MHAOD services that describes the comprehensive care process care provision, care review and transitions of care. Each of these elements is underpinned by collaborative consumer and carer engagement and informed by social and cultural considerations.

In MHAOD services, care review refers to a multidisciplinary process that provides a mechanism for input to the care plan by a range of stakeholders from different disciplines or professional backgrounds within the treating team so the consumer may be afforded a full range of care and treatment options. Care review is informed by ongoing consumer and carer feedback regarding the consumer's progress including responses to medication and other treatment provided and, where clinically indicated, is informed by other stakeholder input from outside the public mental health service which may include but not limited to general practitioners, paediatricians and education.

A range of consumer feedback mechanisms are available to inform service providers and policy makers. The Your Experience of Service (YES) is a national annual survey collection used by all jurisdictions which is designed to gather information about the experiences of care received by people accessing public mental health services in Queensland. As part of the YES collection, the Family of Youth (FoY) survey is given to parents, families and/or carers of children and adolescents accessing mental health services. The results of the YES and FoY surveys are collated and communicated back to consumers and Queensland public mental health services in order to identify areas for improvement and to develop action plans for quality improvement activities. The Mental Health Carer Experience Survey is offered as a continuous collection mechanism for carers and families to provide feedback on their experience of mental health service in order to inform services regarding opportunities for improvement.

All Hospital and Health Services are required to have consumer feedback mechanisms in place to meet NSQHSS. Local procedures exist within Hospital and Health Services for consumers, families and/or carers to provide feedback on health services. For example:

- the Townsville Patient Feedback Service provides opportunities for feedback from patients and their loved ones via multiple mechanisms (e.g. phone, email, webform, paper forms located across facilities).

- For patients' parents, families and carers of Children's Health Queensland the Patient Experience Improvement Officer receives feedback via various mechanisms (e.g. phone, email, webform, paper forms etc).

Information on how consumers and family members can provide feedback to Hospital and Health Services (HHSs) can be found on HHS websites.

Queensland supports greater consistency of approach between States and Territories while appreciating that each jurisdiction has their own existing regulatory framework. Queensland would appreciate the opportunity to work with other States and Territories to harmonise approaches as much as possible.

The Drug Utilisation Sub Committee (DUSC) of the Commonwealth Government's Pharmaceutical Benefits Advisory Committee (PBAC) assesses estimates on projected usage and financial cost for medicines. It also collects and analyses data on actual use (including in comparison with different countries) and provides advice to PBAC.
See: https://www.pbs.gov.au/info/industry/listing/participants/drug-utilisation-subcommittee

The DUSC would have the most relevant details of prescriptions of medicines used to treat ADHD in Australia and published this comprehensive report on the matter in June 2021. See: https://www.pbs.gov.au/industry/listing/participants/public-release-docs/2021-06/guanfacine-prd-2021-06-FINAL.PDF

Under the MPA and subordinate regulation, Queensland Health monitors certain medicines under its real-time prescription monitoring system QScript. These medicines include the Schedule 8 medicines, amfetamines and methylphenidate. These medicines are used to treat ADHD, as well as other conditions such as idiopathic hypersomnolence, narcolepsy, treatment resistant depression and eating disorders. Dispensing records in QScript do not indicate what conditions these medicines are used for. Furthermore, other medicines being used to treat ADHD that are not monitored medicines are not subject to be recorded in QScript and as such no data on these is collected by Queensland Health.

Since QScript commenced in 2021 there have been a total of 18,658 prescriptions for lisdexamfetamine, dexamfetamine and methylphenidate in 2021; 131,879 prescriptions in 2022; and 117,854 prescriptions in 2023 to date. Noting that these figures do not include the full calendar year for 2021, and do not include any of these medicines dispensed for Queensland public sector hospitals.

Queensland Health approves approximately 600 prescribers per month to prescribe either amfetamines or methylphenidate. This number does not include approvals for children between the ages of 4 and 17 years or psychiatrists in Queensland that prescribe within the 'maximum dosage'—neither of these groups require an approval to prescribe.

Should you require further information, the Department of Health's contact is
Acting Executive Director, Healthcare Regulation Branch, Queensland Public Health and Scientific Services, on telephone .

Yours sincerely

Nick Steele
Deputy Director-General
Queensland Public Health and Scientific Services
Queensland Health
14 / 08 / 2023