

Compliance Bulletin – MedsCheck and Diabetes MedsCheck

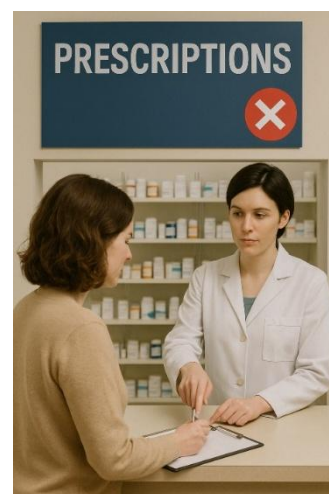
The Pharmacy Programs Administrator (PPA) Compliance team is receiving an increasing number of tip-offs via the [PPA Compliance Tip-Offs](#) webform relating to MedsCheck and Diabetes MedsCheck services. These tip-offs have led to compliance investigations that have resulted in the identification of a high volume of ineligible claims which have subsequently been cancelled and required to be repaid. In some cases, other corrective actions have been taken including suspension of registration for the MedsCheck Program and referral to AHPRA. The [Compliance](#) section of the PPA website and the [PPA Monitoring, Compliance and Audit Factsheet](#) include further educational material.

Case study example: Does this scenario constitute an eligible MedsCheck service?

A pharmacist dispenses a prescription for antibiotics and over-the-counter eyedrops for a new patient, including confirming the patient's home address and Medicare number, at the script in-and-out counter. The pharmacist gives the patient a [MedsCheck Patient Information and Consent Form](#) to sign. The pharmacist then provides general counselling on possible medication interactions and gives the patient a copy of the Consumer Medication Information (CMI) leaflet. The patient leaves the pharmacy after this brief interaction with no other documentation.

Issue 1 – No private consultation room

- ✓ An eligible consultation room is a private area where the patient and the pharmacist can sit down together; this room should be physically separated from the general trading area.
- ✗ Script in-and-out counters (even those with privacy screens) do not meet the requirements for eligible consultation rooms.
- ✗ The pharmacist should not be responsible for dispensing duties when providing MedsCheck services.



Issue 2 – MedsCheck service not undertaken

- ✓ A MedsCheck service involves reviewing a patient's medicines, preparing a reconciled Medication Profile, and developing a detailed Action Plan with the patient that includes patient goals and recommended follow-up actions. See guidance in the [PSA Guidelines](#) for pharmacists about this supporting documentation for MedsCheck and Diabetes MedsCheck services.
- ✓ After submitting a claim for a service, the pharmacist must keep complete and detailed records of all the documentation as outlined in Section 7.3 of the [MedsCheck and Diabetes MedsCheck Program Rules](#) for at least 7 years. These records must be made available to the PPA on request to confirm that the pharmacist provided the service.
- ✗ Providing CMI leaflets and general patient counselling are part of the dispensing process and by themselves do not constitute an eligible MedsCheck service. In the example, the patient was given only a CMI leaflet.

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- ✗ As part of a MedsCheck service, a patient should be given a copy of the reconciled Medication Profile. The profile should include a list of all current medicines but not a full patient history. In the example, the patient was not given a reconciled copy of their Medication Profile.
- ✗ As part of a MedsCheck service, a patient should be given a copy of the detailed Action Plan which includes patient goals and recommended follow-up actions. An Action Plan was not prepared in this example.
- ✗ A signed MedsCheck Patient Consent Form alone is not sufficient to substantiate a claim.

Issue 3 – MedsCheck eligibility criteria not checked

The table indicates what the pharmacist in the example needs to check to ensure that the patient met the eligibility criteria. For full details of the eligibility criteria, see Section 3.2.1 of the [MedsCheck and Diabetes MedsCheck Program Rules](#).

To be eligible for a MedsCheck service, the patient must:	
✓ have a Medicare and/or Department of Veterans' Affairs (DVA) card	✓ The pharmacist confirmed the patient's Medicare card number on their prescription.
✓ not have had a MedsCheck, Diabetes MedsCheck, Home Medicines Review (HMR) or Residential Medication Management Review (RMMR) in the previous 12 months	✗ The pharmacist did not ask the patient if they have received any of these services in the last 12 months. You can check which services a patient has received in the PPA Portal Service History Checker, but note that only services that have been claimed are recorded in the PPA Portal.
✓ be living at home in a community setting	✓ The pharmacist confirmed where the patient is living.
✓ be taking 5 or more prescription medicines when the service is provided OR	✗ The patient is dispensed only one prescription medication during the visit and the pharmacist did not check if the patient is taking other medications.
✓ have recently had a significant medical event OR	✗ The pharmacist did not either discuss the patient's medical history during the brief public interaction or find out if the patient recently had a significant medical event.
✓ be taking a medication associated with a high risk of adverse events (a high-risk medication).	✗ Antibiotics and eye drops are not categorised as high-risk medications.

Compliance support

The PPA encourages you to read the [MedsCheck and Diabetes MedsCheck Program Rules](#) and [PPA General Terms and Conditions](#) carefully. The PPA Compliance team is available to support you and clarify the program requirements to help you to comply. For general compliance enquiries, please call 1800 951 285 and ask to speak to a member of the Compliance team.