Electronic National Residential Medication Charts (eNRMC)

Transitional Arrangement Pharmacy Information Pack

## The eNRMC Transitional Arrangement – an overview

The Department of Health (the Department) is implementing an eNRMC Transitional Arrangement. The Arrangement will allow all Residential Aged Care Services (RACSs) to begin adopting and benefiting from eNRMC products.

The Transitional Arrangement allows RACSs to benefit from the use of eNRMC products that meet the technical requirements of Conformance Profile version 3.0 (CPv3.0), while Prescription Delivery Services (PDSs) and dispensing software vendors continue to work towards conformance with CPv3.0. EMM vendors will need to apply to the Agency to have their product approved as a Transitional eNRMC Product which can then be used under the Transitional Arrangement.

The government is enacting the Transitional Arrangement through an amendment to the eNRMC Trial Legislation: *National Health (Electronic National Residential Medication Chart Trial) Special Arrangement 2018*. The legislation allows RACSs, MPSs and NATISFAC services that provide residential aged care to adopt and use Transitional eNRMC Products for the prescribing and supply of PBS medicines. Although this federal legislation allows RACSs to participate Australia-wide, these products must also meet any [state or territory requirements](https://health.gov.au/resources/publications/enrmc-state-territory-software-requirements) if they wish to participate.

The Transitional Arrangement will start on 1 July 2022 and will continue until broader prescription infrastructure (PDSs and dispense software) reach conformance with CPv3.0.

Similar to the eNRMC Trial, RACSs, prescribers and pharmacies can use a Transitional eNRMC Product for PBS medication chart prescribing, dispensing and administration. When prescribers use a Transitional eNRMC product for medication chart prescriptions, a paper copy of the prescription is not required. However, the software must not send the prescription to the PDS. Therefore, Pharmacists must continue to manually transcribe the prescription information from the Transitional eNRMC Product into their dispensing software. Prescribers and pharmacists must follow specific prescribing, dispensing and claiming requirements under the Transitional Arrangement.

Residential Aged Care Service

For the purposes of this Arrangement, “RACSs” encompasses standard Residential Aged Care Services, National Aboriginal and Torres Strait Islander Flexible Aged Care Program residential services and Multi-Purpose Services that provide residential aged care services. RACSs can use the funding provided through the eNRMC Adoption grant opportunity to help cover the costs of adoption.

## What is an eNRMC Software Product?

An eNRMC Product is a type of EMM system that can legally be used to prescribe, supply, and claim Pharmaceutical Benefits Scheme (PBS) medicines. Prescribers can use eNRMC products to write prescriptions without also writing paper prescriptions.

An eNRMC acts as single source of truth for a patient or resident, consolidating all important information about the medicines prescribed, supplied and administered.

Software vendors are developing eNRMC products conformant with the Australian Digital Health Agency’s Electronic Prescribing CPv3.0. eNRMC Products that are CPv3.0 conformant will connect to dispensing software through a PDS. Dispensing software can then automatically retrieve the prescription information from the electronic chart.

## What are the benefits of using an eNRMC product?

An eNRMC system benefits residents, providers, aged care staff, prescribers, and suppliers, by:

* removing the need for paper-based prescriptions and medication charts,
* decreasing medication safety risks, such as inconsistencies between prescriber records and paper medication charts, also lessening time spent by suppliers reconciling these differences,
* increasing visibility of residents’ medication records for prescribers, suppliers, and aged care staff,
* providing alerts to advise of allergies or medication interactions, and reminders when new prescriptions or follow-up consultations will soon be required,
* providing real-time electronic collaboration and communication tools,
* reducing administrative burden for aged care providers and staff, prescribers, and suppliers, and
* reducing the number of regular medications taken by an individual (polypharmacy).

An eNRMC system enables aged care staff, prescribers, and suppliers to reduce medication errors and gain greater flexibility and coordination in the way their services are delivered. It also supports consumer-centred care and enhances communication between all those supporting the resident’s clinical care.

## What is Transitional eNRMC Software?

A Transitional eNRMC Product is an EMM product that the Agency has assessed as meeting the technical requirements of Electronic Prescribing CPv3.0 but is not integrated with a PDS. Requirements are set out in the Transitional eNRMC Conformance Assessment Requirements.

Following assessment and approval, the Agency will list the Transitional eNRMC Product details (including the software version) on the [*Transitional eNRMC Conformance Register*](https://www.digitalhealth.gov.au/about-us/policies-privacy-and-reporting/registers). The software may then function under the Transitional Arrangement as a Transitional eNRMC Product.

A Transitional eNRMC Product can create legal PBS prescriptions without requiring a paper copy of the prescription. Transitional eNRMC Products must not transmit prescriptions to a Prescription Delivery Service. Therefore, pharmacists must manually transcribe the prescription information into their dispensing software. Any supplier can dispense medication against these electronic medication charts.

## How are Transitional eNRMC Products different to CPv3.0 Conformant eNRMC Products?

Transitional eNRMC Products are temporary software versions which will become CPv3.0 Conformant eNRMC Products. They are products that the Agency has assessed as meeting the technical requirements of CPv3.0 but are not integrated with a PDS. This means that the Agency cannot:

* approve the product as compliant with all aspects of the CPv3.0
* give the product a valid Electronic Prescribing Conformance ID
* register the product on the [*Electronic Prescribing Conformance Register*](https://www.digitalhealth.gov.au/about-us/policies-privacy-and-reporting/registers)

Instead, the Agency will list approved Transitional eNRMC Products on the [*Transitional eNRMC Conformance Register*](https://www.digitalhealth.gov.au/about-us/policies-privacy-and-reporting/registers).

## I’m a pharmacist servicing a RACS that is using a Transitional eNRMC Product – what do I need to do?

Pharmacies servicing RACSs that have adopted Transitional eNRMC Products have several obligations. Pharmacists must:

* follow all PBS dispensing legislation (including state and territory legislation relevant to their location)
* ensure they have access to view and annotate the electronic medication charts for the consumers they are dispensing medicines for
* ensure they understand how to view and annotate the electronic medication charts or seek training from the software vendor
* ensure they are aware of the processes for dispensing and claiming from a Transitional eNRMC Product

## I’m a pharmacist servicing a RACS that is already participating in the eNRMC Trial – what do I need to do?

Pharmacists already servicing a RACS under the eNRMC Trial should contact the RACS to discuss the eNRMC Transitional Arrangement. However, the requirements for dispensing and claiming of PBS medicines under the existing trial and the eNRMC Transitional Arrangement are the same.

## What does the prescribing, dispensing, and claiming workflow look like under the Transitional Arrangement?

1. The prescriber logs into the Transitional eNRMC Product to create or amend a medication chart prescription. The medication chart order is available in the Transitional eNRMC product in real time.
2. The pharmacist logs into the Transitional eNRMC Product to view the medication chart/order. The pharmacist transcribes the electronic medication chart prescription information into their dispensing software. The pharmacist can annotate and send messages to the prescriber and RACS in the Transitional eNRMC Product.
3. The pharmacist dispenses the medication, identifying the PBS claim as a paper medication chart (‘P’) and Patient Category as either of the following depending on the medication prescribed:
   1. Residential aged care service patient (‘R’);
   2. Residential aged care service patient (prescription that is not a PBS NRMC prescription) (‘N’)
4. The pharmacist sends the medication to the RACS for administration
5. The RACS records all administration events in the medication chart at the point of administration

# What medicines can be prescribed under the Transitional Arrangement?

| **Summary** | **Transitional eNRMC** | **Restrictions** |
| --- | --- | --- |
| General schedule PBS medicines (no authority requirements) | YES | Nil. Can be prescribed and supplied for duration of chart. |
| PBS Items requiring **Streamlined Authority** (Non-Schedule 8) | YES | Nil. Can be prescribed and supplied for duration of chart. |
| Schedule 8 medicines **(Streamlined)** | YES | PBS listing restrictions and maximum quantities must be observed. Cannot be prescribed and supplied for duration of chart. |
| PBS Items requiring **Telephone or Written Authority Approval (including Schedule 8)**  (For written authority approvals, printed paper copy of the eNRMC must be submitted to Services Australia) | YES | Duration of supply based on PBS authority approval. Prescriber must entre cease date corresponding to authority approval. |
| PBS Section 100 medicines | NO | Cannot be prescribed using Transitional eNRMC products |

State or Territory permits/approvals may be required.

## What are the dispensing requirements and processes under the Transitional Arrangement?

Under the Transitional Arrangement, Pharmacists will require individual access to the Transitional eNRMC software where they can view and annotate medication orders. They must manually transcribe the medication order information from the Transitional eNRMC software directly into their dispensing software.

As per current eNRMC Trial legislative requirements, copies of all prescriptions must be retained in the Transitional eNRMC software as part of the residents’ medication record for two years.

The use of Transitional eNRMC software products ensure pharmacies are dispensing and claiming from real time accurate information and provides direct messaging functionality with prescribers and RACS staff. While pharmacists may annotate a medication order when they have concerns of the prescription, they will not have the ability to amend them.

## What are the claiming requirements and processes under the Transitional Arrangement?

All Medicines dispensed under the Transitional Arrangement must be flagged as paper prescriptions with a ‘P’ flag.

Where claiming software allows, approved pharmacists should use the Patient category ‘R’ for all claims. When the system does not allow claiming for Schedule 8 medications or authority medications (approved by Services Australia by telephone or in writing), pharmacists must use Patient Category 'N'.

All claims must also include a RACF ID, in line with all other aged care claims. The following table sets out how PBS medicines should be prescribed, supplied, and claimed under the eNRMC Trial.

| Summary | Trial | Transitional eNRMC | CPv3.0 Conformant eNRMC |
| --- | --- | --- | --- |
| General schedule PBS medicines (no authority requirements) | YES *(Patient Category* ***R*** *– NRMC)* | YES *(Patient Category* ***R*** *– NRMC)* | YES *(Patient Category* ***R*** *– NRMC)* |
| All Schedule 8 medicines | YES *(single PBS supply only)* *(Patient Category* ***N*** *– non NRMC)* | YES *(single PBS supply only)* *(Patient Category* ***N*** *– non NRMC)* | YES (*single PBS supply only) (Patient Category* ***R*** *–NRMC)* |
| PBS Items requiring **Streamline Authority (Non-Schedule 8)** | YES *(Patient Category* ***R*** *–NRMC)* | YES *(Patient Category* ***R*** *–NRMC)* | YES *(Patient Category* ***R*** *–NRMC)* |
| PBS Items requiring **Telephone Authority Approval** | YES *(Patient Category* ***N*** *– non NRMC)* | YES *(Patient Category* ***N*** *– non NRMC)* | YES (*Patient Category* ***R*** *–NRMC)* |
| PBS Items requiring **Written Authority Approval** (\*a printed paper copy of the eNRMC must be submitted to Services Australia for approval) | YES *(Patient Category* ***N*** *– non NRMC)* | YES *(Patient Category* ***N*** *– non NRMC)* | YES *(Patient Category* ***R*** *–NRMC)* |
| Required Prescription Format for PBS claiming. | P = Paper | P = Paper | E = Electronic |
| NRMC Duration | 4 months | 4 months | 6 months |

## What must pharmacists that service RACSs do when the Transitional Arrangement ends

When the Transitional Arrangement ends pharmacists servicing RACSs will have several obligations. Pharmacists must:

* perform any actions required to ensure they upgrade their dispensing software to the CPv3.0 conformant version listed on the [*Electronic Prescribing Conformance Register*](https://www.digitalhealth.gov.au/about-us/policies-privacy-and-reporting/registers)
* be aware that as per the [*National Health (Pharmaceutical Benefits) Regulations 2017*](https://www.legislation.gov.au/Details/F2020C00815)the electronic medication chart durations for CPv3.0 Conformant eNRMC Products are as follows:
  + Trial and Transitional eNRMC Product medication charts are 4 months
  + CPv3.0 Conformant eNRMC Product medication charts are 6 months
* note that CPv3.0 Conformant eNRMC Products are end-to-end electronic prescriptions. This means that pharmacists will no longer be required to manually transcribe the prescription information from a Transitional eNRMC Product into their dispensing software.

Further Information

For further information concerning the transitional arrangement and eNRMC, please contact the department of health at [eNRMC@health.gov.au](mailto:eNRMC@health.gov.au).

For clarifications about PBS and RPBS claiming information requirements for an eNRMC, please contact Services Australia at [devsupport@servicesaustralia.gov.au](mailto:devsupport@servicesaustralia.gov.au)