Australian Government
Department of Health and Aged Care

Electronic National Residential Medication Charts (eNRMC)

Electronic Medication Management (EMM) Vendor Information Pack

The eNRMC Transitional Arrangement – an overview

The Department of Health (the Department) is putting in place 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 Australian Digital Health Agency (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 Transitional eNRMC Products under the Transitional Arrangement. Although this federal legislation allows RACSs to participate Australia-wide, these products must also meet any state or territory requirements if they wish to participate.

The Transitional Arrangement will start on 1 July 2022. The Department anticipates that it will continue until 23 November 2023. This is the Sunsetting date of CPv2.3, by which time PDSs and dispensing software must 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 are the benefits of using an eNRMC?

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.

How are Transitional eNRMC Conformance Requirements different from CPv3.0 Requirements?

Transitional eNRMC Conformance Requirements are the same as CPv3.0 requirements. Both will use the conformance test specifications (CTS) v3.0.1. However, the Agency cannot assess and approve an EMM product as a CPv3.0 Conformant eNRMC Product until it connects to and is tested against an approved CPv3.0 Conformant PDS.

The process for seeking approval as a CPv3.0 Conformant eNRMC Product is different to the process for Transitional eNRMC Products:

- Transitional eNRMC: The Open PDS will not observe the vendor when the vendor is completing the conformance tests. The vendor will complete all relevant conformance test cases in the CTSv3.0.1. The vendor will then send the test evidence of Transitional eNRMC Product conformance to the Agency.
- CPv3.0 Conformant eNRMC: The vendor completes all relevant conformance test cases in the CTSv3.0.1. An Open PDS will observe the vendor completing these conformance tests. The vendor will then send test evidence to the Open PDS and the Agency. The Agency will assess the test evidence, along with the Electronic Prescribing Conformance Vendor Declaration form.

Once the PDSs and dispensing software become CPv3.0 conformant, Transitional eNRMC Product vendors must apply for their products to become CPv3.0 Conformant eNRMC Products. Once approved, the Agency will list CPv3.0 Conformant eNRMC Products on the *Electronic Prescribing Conformance Register*. Once listed, the products will be able to send electronic medication chart prescriptions to the PDS.

Vendors can find out more information on CPv3.0 Conformance on the Agency's website.

What are the Transitional conformance requirements?

A Transitional eNRMC Product must meet all the same conformance requirements of a CPv3.0 Conformant eNRMC including:

- all CPv3.0 requirements which includes medication chart prescribing system requirements, security requirements, and Healthcare Identifier service requirements
- all Pharmaceutical Benefits Scheme (PBS/RPBS) prescribing and supply requirements for medication charts in the National Health (Pharmaceutical Benefits) Regulations 2017
- all PBS information requirements outlined in the Instrument of Approval for National Residential Medication Charts
- all State and Territory legislative requirements for the prescribing, supply, and medicine administration

There is no requirement for formal Healthcare Identifier testing prior to obtaining Transitional eNRMC Conformance. However, formal Healthcare Identifier testing will be required to become a fully CPv3.0 Conformant Product. Formal Healthcare Identifier testing can be done at any time through the Agency.

The vendor must complete all relevant conformance test cases in the conformance test specifications (CTSv3.0.1) and send this evidence to the Agency. However, as the PDS vendors have not achieved formal conformance with CPv3.0, Transitional eNRMC Products cannot connect to a PDS. This means that the Agency cannot:

- approve the product as conformant 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*

Instead, the Agency will list approved products on the *Transitional eNRMC Conformance Register*.

What is the process for software to be approved as a Transitional eNRMC Product?

The Agency is responsible for managing the assessment and approval process for Transitional eNRMC Products. For more information on the Transitional eNRMC Product approval process, please contact the Agency on help@digitalhealth.gov.au.

EMM vendors will go through the following process to have their product approved as a Transitional eNRMC Product:

1. Vendor engages their preferred PDS
2. Vendor ensures product meets the technical specifications of the chosen PDS
3. Vendor ensures product meets all CPv3.0 conformance requirements for a medication chart prescribing system
4. Vendor gains access to PDS's eNRMC transition approved CPv3.0 test environment
5. Vendor completes all relevant conformance test cases in the CTSv3.0.1
6. Vendor submits test evidence to the Agency for assessment
7. The Agency review test evidence and results (about 2-3 weeks)
8. If successful, the Agency will advise the vendor and the Department of Health of the outcome
9. The Department of Health will send a Deed of Agreement with 'self-declaration' of conformance with Transitional eNRMC Conformance Requirements to the vendor for signing
10. Once signed, the Agency will list the approved Transitional eNRMC Product on the *Transitional eNRMC Conformance Register*
11. Vendors can start operating under the conditions of the Transitional Arrangement, as per the Legislative Instrument

If formerly operating under eNRMC Trial conditions, the Department of Health will remove the vendor from the Schedule on the Special Arrangement.

What must EMM vendors do once their product is approved under the Transitional Arrangement?

EMM vendors that have their product approved and listed on the Agency's Transitional eNRMC Conformance Register will have several obligations. EMM vendors must:

- ensure they understand and follow participation conditions under the Transitional Arrangement as outlined in the Deed of Agreement including:
    - software requirements
    - requirements for the storage and copying of electronic medication orders
    - audits
    - reporting
    - complying with laws
    - requirements for transitioning to CPv3.0
- communicate their Transitional eNRMC Product status to RACSs that are using their EMM
- let their RACSs know if they need to take any actions to upgrade their product to the Transitional eNRMC Product version
- give access to the Transitional eNRMC Product for pharmacists that service RACSs using their product
- give information and training to pharmacists about how to view and annotate the electronic medication charts
- ensure the Transitional eNRMC Product meets State and Territory requirements and that the relevant jurisdiction has approved its use
- not allow connectivity with PDSs – only CPv3.0 Conformant eNRMC Products are allowed to use this function
- go through the process to have their product approved as a CPv3.0 Conformant eNRMC Product once PDSs achieve conformance with CPv3.0.

Vendors may also review the software vendor information resource developed by the Department of Health and the Australian Commission on Safety and Quality in Health Care. This resource supports vendors to find opportunities for system enhancement, which facilitates safer medication management and improved quality use of medicines.

Is it mandatory for RACSs to adopt an eNRMC?

Adoption of an eNRMC product is not mandatory and paper NRMCs continue to be valid medication charts in RACSs. Residents or their substitute decision makers should have the opportunity to opt out of electronic medication chart prescribing. This is consistent with the current Quality Standard on consumer choice. However, the Department encourages the adoption and use of a conformant eNRMC product to support safe and accountable medication management. Adoption of an eNRMC product may be a requirement for various funding opportunities in the future.

Do eNRMC Trial vendors have to apply for their products to become Transitional eNRMC Products?

EMM vendors that operate under the eNRMC Trial need to have their products assessed and approved by the Agency should they wish to roll out their products under the Transitional Arrangement. Vendors may decide to continue operating under the Trial until PDS and dispensing software reach conformance with CPv3.0. However, eNRMC Trial software vendors should note:

- RACSs can only adopt Transitional or CPv3.0 Conformant eNRMC Products under eNRMC Adoption grant opportunity
- once the broader sector has reached conformance, eNRMC Trial software vendors must apply to have their software approved by the Agency as a CPv3.0 Conformant eNRMC Product

My product was not part of the eNRMC Trial - does it have to become a Transitional eNRMC Product?

EMM products do not have to become Transitional eNRMC Products before becoming CPv3.0 Conformant eNRMC Products. However, under the eNRMC Adoption grant opportunity RACSs will only be able to adopt Transitional eNRMC Products or CPv3.0 Conformant eNRMC Products.

What must EMM Vendors do when the Transitional Arrangement ends?

Trial and Transitional eNRMC Product vendors will have several obligations when the Transitional Arrangement ends. Vendors must:

- have completed and passed the testing process for CPv3.0 and ensure the Agency has listed their product on the *Electronic Prescribing Conformance Register*
- inform RACSs that are using their Trial or Transitional eNRMC Products that their status has changed to a CPv3.0 Conformant eNRMC Product
- give RACSs details about any actions they need to take to ensure they upgrade to the CPv3.0 conformant version of their product
- ensure that any RACSs that do not upgrade to the CPv3.0 conformant version of their product are aware they may no longer use the Trial or Transitional version of the eNRMC product for chart-based prescribing.

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
2. The medication chart order is available in the Transitional eNRMC product in real time. The pharmacist transcribes the electronic medication chart prescription information into the 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, flagging the PBS claim as a ‘P’ and Patient Category as ‘R’ or ‘N’ depending on the medication prescribed, in the dispensing system to be submitted to Services Australia for payment
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 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 other aged care claims. The following table sets out how PBS medications should be prescribed, supplied, and claimed under the eNRMC Trial.

Summary	Trial	Transitional eNRMC	CPv3.0 Conformant eNRMC
Eligible to prescribe and supply Nil Authority medicines	YES *(Patient Category **R** – NRMC)*	YES *(Patient Category **R** – NRMC)*	YES *(Patient Category **R** – NRMC)*
Eligible to prescribe and supply 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** – non NRMC)*
Eligible to prescribe and supply PBS Items requiring **Streamline Authority (Non-Schedule 8)**	YES *(Patient Category **R** – NRMC)*	YES *(Patient Category **R** – NRMC)*	YES *(Patient Category **R** – NRMC)*

Summary	Trial	Transitional eNRMC	CPv3.0 Conformant eNRMC
Eligible to prescribe and supply PBS Items requiring **Telephone Authority Approval**	YES *(Patient Category **N** – non NRMC)*	YES *(Patient Category **N** – non NRMC)*	YES (*Patient Category **R** – NRMC)*
Eligible to prescribe and supply 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** – non NRMC)*
Required Prescription Format for PBS claiming.	P = Paper	P = Paper	E = Electronic
NRMC Duration	4 months	4 months	6 months

Further Information

For further information concerning the transitional arrangement and eNRMC, please contact the department of health at 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