



Your duty to provide CMIs

I recently rang national president of the Pharmaceutical Society of Australia, Brian Grogan, to congratulate him on a recent media statement which urged consumers to ask for a consumer medicines information (CMI) document with their next prescription.

Brian was making the important point that health consumers and government are concerned that not all pharmacists are meeting their obligations on the provision of CMIs to consumers when necessary. This is despite all pharmacies being funded to deliver the service.

He said that despite a lack of hard supportive data, anecdotal evidence supports the complaints and I would have to agree with him. I think we've all heard of accounts where customers have failed to receive CMIs as appropriate, let alone appropriate counselling.

I can't help thinking that those pharmacists who fail to provide CMIs are also more likely to fail to live up to their counselling obligations. Those who do deliver effective counselling often use CMIs as a prompt when counselling customers about their medicines.

There may not be any legislation which specifically requires a pharmacist to supply a CMI to a patient, but never forget that pharmacists do have a legal and professional obligation to ensure that a patient has all the necessary information to enable them to make informed decisions about their health. This is one of the important principles of the quality use of medicines and certainly covers the provision of CMIs as appropriate.

This includes any relevant information within the CMI which is particular to the customer, and ensuring that the customer actually understands the information they receive.

If this means making additional notes on the CMI itself, these should be clearly identified and signed by the pharmacist who made the additions. Failure to do so could expose pharmacists to legal action under the product liability laws, as the

CMIs are official manufacturers' product documents.

As mentioned in the PSA guidelines document, *Consumer Medicines Information and the Pharmacist*, not every aspect of CMI requires discussion, but the following are suggested:

- highlighting parts of the CMI which are particularly relevant to that patient;
- using the CMI in an interactive manner and encouraging the patient to read and seek clarification as necessary; and
- providing further relevant information such as about the disease or the approved Product Information.

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Let's also not forget that patient privacy should also be considered when discussing a CMI with a customer, as with any communication about medicines. Information contained in a CMI is intended for the person taking the medicine and should not be shown to anyone other than the patient, unless that person has been authorised by the customer to see the CMI or there are compelling grounds.

While provision of CMI does not fundamentally change the pharmacist's legal responsibilities, it does extend them. As well as improving patient care, CMIs also help to increase patient awareness of their legal rights to information about medicines. In order to provide a degree of legal protection, pharmacists are encouraged to develop reliable systems for documenting the provision of, and/or refusal to accept CMIs.

The old saying goes, 'You're only as

good as your weakest link', and there is no doubt that those who fail to meet their obligations, such as with the provision of CMIs, undermine the excellent work of those who meet their professional obligations and place the care of the customer above all else.

Beware the non-practicing registration

Pharmacy Boards have begun differentiating their registration requirements, with some states now allowing for non-practising registrations as well as full practice registration. This is a positive move and provides for more flexibility within the profession.

However, I have heard stories of pharmacy owners taking these options as they begin to move away from professional practice to a more general management role within their pharmacies.

Don't forget: a pharmacy owner must be fully cognisant of everything that occurs in their pharmacy and I doubt whether a non-practicing registration would be helpful to a pharmacy owner in a court of law.

Check all DAAs

Dose administration aids (DAAs) have become important tools for pharmacists who need to help customers remember to take all their medicines. Their value has also been recognised by the Federal Government which has agreed to fund the delivery of DAA services under certain circumstances.

Many pharmacists who deliver such services have a special area, often in the back of the pharmacy and away from the public eye, where DAAs are filled. Checking that DAAs have been filled correctly is just as important as your usual dispensary checking process. Only checking one in 10 DAAs—a practice actually recommended by a pharmacy owner to a young and concerned pharmacist who spoke to me recently—is not an acceptable practice and would attract action in any court of law. ■