

1 July 2020

PHARMAC

By email: [consult@pharmac.govt.nz](mailto:consult@pharmac.govt.nz)

### **Proposal relating to schedule changes made in response to COVID-19**

Dear Sir / Madam

The New Zealand Medical Association (NZMA) wishes to provide feedback on the above proposal. We note that the proposal relates to the longer-term funding arrangements for many pharmaceuticals for which PHARMAC amended or removed funding criteria over the last few months in order to help improve access to these treatments in anticipation of and/or response to COVID-19 impacts on the health sector.

The NZMA welcomed PHARMAC's lifting of restrictions to make these pharmaceuticals more accessible and we are broadly supportive of the longer-term arrangements PHARMAC is now proposing. In particular, we welcome PHARMAC making the removal of the 'Retail Pharmacy-Specialist' restriction from a number of community pharmaceuticals permanent.

With respect to Special Authority and endorsement requirements, we note that PHARMAC is proposing that temporary criteria changes relating to specialist consultations and laboratory testing would be reversed from 1 September 2020, and temporary criteria changes relating to radiology and other hospital-based diagnostic procedures would be reversed from 1 December 2020. We have some concerns that there may be access issues for echocardiography for cardiovascular medicines, and even possibly for spirometry, beyond 1 December. Given the backlog in access to these investigations in some areas, reintroducing these requirements could represent a significant barrier and cause equity issues as access is likely to be uneven across the country.

We also seek clarification on what the reversal of temporary changes to restrictions means for patients that have started on these medicines. Specifically, will they need to meet the original criteria from 1 December? For example, if funding of a cardiovascular medicine is once again dependent on the result of an echocardiogram, should a patient that commenced this medicine during COVID-19 still be referred for this test or would they continue to be eligible for funded access post 1 December? Alternatively, we ask whether PHARMAC is considering the use of an additional criteria for such patients such as the approach that already exists with renewals, along the lines of "if has been on treatment and shown benefit on the drug."

We hope our feedback is helpful.

Yours sincerely



Dr Kate Baddock  
NZMA Chair