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**The Royal Australasian College of
Physicians' submission to the
Ministry of Health on proposed
additions to the Schedule of
Specified Prescription Medicines
Designated Registered Nurse
Prescribers 2016**

Hōngonoi 2022

Introduction

The Royal Australasian College of Physicians (RACP) welcomes the opportunity to submit feedback to the Ministry of Health on the proposed additions to the Schedule of Specified Prescription Medicines for Designated Registered Nurse Prescribers 2016.

The RACP works across more than 40 medical specialties to educate, innovate and advocate for excellence in health and medical care. Working with our senior members, the RACP trains the next generation of specialists, while playing a lead role in developing world best practice models of care. We also draw on the skills of our members, to develop policies that promote a healthier society. By working together, our members advance the interest of our profession, our patients and the broader community.

Overall comment

The RACP welcomes the Ministry of Health's proposal to extend the Schedule of the Specified Prescription Medicines for Designated Registered Nurse Prescribers 2016 to include oral antiviral medicines Paxlovid and Lageviro for the treatment of COVID-19. We commend the Ministry for acknowledging that registered nurse (RN) prescribers are well positioned to ensure equitable and timely access to COVID-19 treatments for whānau and communities.

The RACP has previously provided feedback to the Ministry of Health on non-medical prescribing. In 2021 we submitted on registered nurse prescribing on [amendments to the specified prescription medicines list](https://www.racp.edu.au/docs/default-source/advocacy-library/racp-submission-to-moh-consultation-on-proposed-amendments-to-the-specified-prescription-medicines-list.pdf?sfvrsn=50e6fd1a_14)¹, emphasising the opportunities provided by widening the availability of medicines that nurses can prescribe. Earlier in 2022 we commented on a proposal for the inclusion of a range of COVID-19 treatments in a submission on [amendments to the schedule of the medicines \(designated pharmacist prescribers\) regulations 2013](https://www.racp.edu.au/docs/default-source/advocacy-library/racp-submission-amendments-to-the-schedule-of-the-medicines-designated-pharmacist-prescribers.pdf?sfvrsn=4ab0cd1a_8)². Among RACP members who were supportive of pharmacist prescribing, it was agreed that Paxlovid and Lageviro be added to the schedule, due to their potential to prevent hospitalisation and death from COVID-19.

RACP members who provided feedback regarding this proposal were in unanimous support of the amendments to the Schedule to enable designated RN prescribers to prescribe oral antiviral medicines, Paxlovid and Lageviro. Please note our feedback is reflective of advice and feedback provided by RACP members during the consultation period and does not represent an exhaustive analysis of the positions of all members.

A key reason given by members for support of this proposal was to improve equitable and timely access to treatments among populations more vulnerable to the effects of COVID-19. For example, people living with disabilities are more vulnerable to the effects of COVID-19 than the general population, but sometimes have difficulty accessing GPs or other doctors to obtain a prescription. Enabling registered nurses designated to prescribe these treatments would increase the likelihood that people with disabilities can access this lifesaving medication early in the course of their illness when it can be more effective. As such, this proposal aligns with the RACP's vision for health equity

¹ Royal Australasian College of Physicians. Submission to the Ministry of Health on Proposed Amendments to the Specified Prescription Medicines List. [Internet] Wellington: Royal Australasian College of Physicians; 2021. Available from: https://www.racp.edu.au/docs/default-source/advocacy-library/racp-submission-to-moh-consultation-on-proposed-amendments-to-the-specified-prescription-medicines-list.pdf?sfvrsn=50e6fd1a_14 Downloaded on 27 June 2022.

² Royal Australasian College of Physicians. Submission to the Ministry of Health on Amendments to the Schedule of the Medicines Designated Pharmacist Prescribers Regulation 2013. Available from: https://www.racp.edu.au/docs/default-source/advocacy-library/racp-submission-amendments-to-the-schedule-of-the-medicines-designated-pharmacist-prescribers.pdf?sfvrsn=4ab0cd1a_8 Downloaded on 27 June 2022.

in Aotearoa New Zealand through addressing the social determinants of health [#MakeittheNorm](#), tackling barriers to access to treatments such as cost, transport and geography³.

Conclusion

The RACP thanks the Ministry of Health for the opportunity to provide feedback on this consultation. To discuss this submission further, please contact the NZ Policy and Advocacy Unit at policy@racp.org.nz.

Nāku noa nā

A handwritten signature in black ink, appearing to be 'S. Inns', written over a faint, illegible background.

Dr Stephen Inns FRACP
President, Aotearoa New Zealand
The Royal Australasian College of Physicians

³ Royal Australasian College of Physicians. Make it the Norm: Equity through the social determinants of health. [Internet] Wellington: Royal Australasian College of Physicians; 2020. Available from: https://www.racp.edu.au/docs/default-source/policy-and-adv/aotearoa-new-zealand/make-it-the-norm-equity-through-the-social-determinants-of-health.pdf?sfvrsn=10ea011a_8 Downloaded on 27 June 2022.

