

PSSA Legislation Webinar Series

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PCDT:
PERMIT APPLICATION
PROCESS



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Legal framework for issuing of permits

Why would a pharmacist require a permit to provide a PCDT service?

- Pharmacists are allowed to supply / sell medicine up to Schedule 2 without a prescription from an authorised prescriber – don't require a permit
- A PCDT service may require access to certain higher scheduled medicine to meet the health needs of a patient;
- A pharmacist who wishes to provide a PCDT service must, therefore be specifically authorised in terms of Section 22A(15) of the Medicines Act, Act 101/1965, as amended, (i.e. to be issued with a permit) to obtain access to such higher scheduled medicine but subject to certain terms and conditions and which form part of such “authorisation” (or permit)



Legal framework for issuing of permits

Section 22A(15) of the Medicines Act

To establish / clarify the nature and extent of the “authorisation” provided to PCDT pharmacists in terms of Section 22A(15) of the Medicines Act, the following wording of the relevant section is important to note:

“The Director-General (of NDOH) may, after consultation with Council, issue a permit to any person (such as a pharmacist) ... performing a health service (*such as PCDT*), authorising such person ... to acquire, possess, use or supply any specified Schedule 1 to 5 substance, and such permit shall be subject to such conditions as the Director-General may determine”

Note: Words in brackets or underlined, my emphasis



Legal framework for issuing of permits

Types of permits

For purposes of PCDT, there are two types of permits which could be issued to pharmacists who have been authorised by Council to provide PCDT, namely:

- Permit to be used by a specific pharmacist at a **specific approved pharmacy** only. [Pharmacist's P-number and Y-number of approved pharmacy is linked]; and
- Locum permit to be used by a specific pharmacist in a **specific area** (such as Gauteng) and at approved PCDT pharmacies in such area only (i.e. where there is already a PCDT pharmacist employed)

Conditions are determined by the Director-General of NDOH for each type of permit



Legal framework for issuing of permits

Conditions and requirements for the issuing of permits

- A duly completed application for a PCDT permit must be submitted to the Director-General (DG) of NDOH (refer link for application form)
- Application must be in duplicate in order for a copy to be submitted to the SAPC for consideration and recommendation
- Only pharmacists who have registered their PCDT qualification with the SAPC may apply;
- Certain documents must be submitted with application, including a pharmacy floor plan (refer application form)



Legal framework for issuing of permits

Conditions and requirements for the issuing of permits

- On receipt of the permit, the pharmacist must record such permit with the SAPC within 30 days (online process, no fees payable);
- The owner (pharmacist) of the PCDT permit must sign a declaration that:
 - ✓ the PCDT services will only be provided at a pharmacy licensed and recorded with Council (i.e. the approved pharmacy, the name of which will appear on the permit)
 - ✓ the PCDT services will be conducted in accordance with the provisions of GPP; and
 - ✓ the PCDT services will be provided in accordance with PHC EML / STG as published by NDOH



Legal framework for issuing of permits

Conditions and requirements for the issuing of permits

- Permits (including renewal permits) are issued for a period of five (5) years. Applications for a renewal permit must be submitted to NDOH at least 90 days before the expiry date of such permit;
- **Individual permits** are issued to a specific pharmacist to authorise such pharmacist access to certain higher scheduled medicine at a specific and approved (by Council) pharmacy
- **Locum permits** are issued to a specific pharmacist to authorise such pharmacist access to certain higher scheduled medicine at PCDT approved pharmacies (by Council) in a specific area. The area is indicated on the permit



Legal framework for issuing of permits

Conditions and requirements for the issuing of permits

- NB: Access to higher scheduled medicine is restricted to those medicine required to meet the health needs of a patient in terms of the PHC EML / STG as published by NDOH (available on NDOH website). Medicine may thus only be prescribed if in line with the PHC STG and on the EML for a specific condition (refer ICD10 code)
- Pharmacists who have completed PCDT prior to February 2011 – proof of completion of CPD update course of PCDT required
- Pharmacists who obtained PCDT qualification after February 2011 – certified copy of qualification to be submitted with application
- Note: the permit is not issued to a pharmacy but to a pharmacist



Legal framework for issuing of permits

GPP evaluation of pharmacy by SAPC

- An applicant (pharmacist) for a Section 22A(15) permit must indicate on the application form at which pharmacy the intention is to provide a PCDT service and provide the Y-number of the pharmacy concerned, including a pharmacy floor plan
- NDOH will refer the application to Council for purposes of a GPP evaluation of the pharmacy concerned. In general, the pharmacy must comply with the requirements of Rule 1.2.12 and 1.2.13 of the GPP Rules
- Council will, if compliant, make an appropriate recommendation to NDOH
- Questions to SAPC / NDOH (This is not an exhaustive list of questions and/or responses)



Questions to and response (**in red**) from NDOH

- Is application form still the same – where should pharmacists go and look for an application form (is there a link)?;

The application process is still the same. The forms are on the NDOH website www.health.gov.za (Go the Affordable Medicines link on the right hand side of the page, Click the Licensing Unit folder, Open the Permits Folder. The form for new Section 22A(15) Permits is in the folder). The link is as follows:<http://www.health.gov.za/index.php/affordable-medicines/category/271-affordable-medicines-permits>

- If you wish to apply for a locum permit, you merely write “locum permit” where address / name of pharmacy is required?; **Yes**
- Is locum permit still issued per area/ region only but only to be used at an approved PCDT pharmacy in such area/region?; **Yes**
- Expiry date for permit: Issued for five years both new and renewal?; **Yes - it is 5 years for both new and renewals**



Questions to and response (**in red**) from NDOH

- May applicants still deliver applications (new and renewal) to Pharmacy Council Offices? (I would assume that under lockdown, no “walk-inns” at Council building would be allowed?)

Applications for new permits may be delivered to the SAPC offices at 591 Belvedere Street, Arcadia **on Tuesdays and Thursdays only. Applicants may also email applications to permits@health.gov.za** Lockdown restrictions must be adhered to - masks and temperature checks.

- Latest PHC EML/STG for permit?; **The list has not changed.**
- Must applications only be forwarded to DOH, to whom? Deliveries – where?;

Renewal applications may be emailed to permits@health.gov.za with the subject line - PCDT Renewal - Initials and Surname (P-Number)



Questions to and response (**in red**) from NDOH

- Is DOH up to date with new or renewal applications?;

The Department continues to work closely with the SAPC to ensure that we issue permits as quickly as possible.

- Where must applicants collect their permits – who will inform them to collect?;

They can collect from the SAPC offices at 591 Belvedere Street, Pretoria. They will be informed by DoH officials when their permits are ready for collection.

- Anything else I need to tell potential applicants?

To please exercise patience as we are in trying times. To ensure that they quote the subject line on all emails sent have the following structure - Query - Initials, Surname and P-Number



Questions to and response (**in red**) from SAPC

- How and when is application (new and renewal) forwarded to Council for a GPP evaluation?

Not sure about the timelines for DOH, we receive their applications weekly.

- What does the GPP evaluation for a permit entail?. What happens to the evaluation once done?

SAPC check supplementary registration with Council and that the pharmacy meets rule 1.2.12 and 1.2.13 of the GPP

- Are Applicants kept up to date with progress relating to evaluation and/or issuing of permit process? – is there acknowledgement of receipt;

Once a permit is recommended, it is immediately sent to NDOH. The applicant have access to the recommendation on the secure site under registration page, my documents



Questions to and response (**in red**) from SAPC

- How long is the evaluation process taking?

Timelines for SAPC is 14 days. Permits recommended are tabled at practice committee for noting

- How many **PCDT qualifications** recorded with Council to date?

By 01 June, there were 427 pharmacists that registered their PCDT supplementary training

- How many PCDT Permits recorded with Council to date?

By 01 June 2020, there were 181 – some might have expired at some stage, we do not have a system that captures the end date.



Questions to and response (**in red**) from SAPC

- Is there any communication with BHF regarding the issuing of **locum permits** – for example, the arrangement with BHF was that it would contact Council to get the names (Y-numbers) of all approved PCDT Pharmacies in a specific area for purposes of “linking” it to the relevant locum permit?

Yes but not consistent - MOU is been drafted by legal unit to formalise the sharing of data.

- Who could applicants contact at Council if they should have enquiries, including relating to “where is my application”?

SAPC Customer care – Official communication line



Payment of PCDT services by Medical Schemes

Practice Code Number Application

- If a PCDT pharmacist with a permit wishes to claim for services provided h/she must first apply for a PCN from BHF (Category: Primary Care Drug Therapist)
- Application form, documents to be submitted and fees payable are available on BHF website (refer link)
- A 063 ... PCN will be issued and must be used for all PCDT claims - to be captured in "Prescriber Field"
- If any claim is rejected, please contact paying offices: Medikredit/Mediscor for assistance



Payment of PCDT services by Medical Schemes

Medical Schemes paying for PCDT claims

[as provided by Medikredit/Mediscor, March 2020]

Schemes Pay: Medicine on script of PCDT where PCDT BHF is captured in Prescriber field	Schemes Pay: Tariff Code 0010 for PCDT consultation
WCMAS	WCMAS R 160.00 (incl. Vat)
Pick n Pay	Profmed pays R 214.20 (incl. VAT)
SAB	KeyHealth pays R 163.00 (Incl. VAT)
BIMAF	Bestmed ?
Cigna	
Bankmed	
GEMS	
CAMAF	



Payment of PCDT services by Medical Schemes

Medical Schemes paying for PCDT claims

[as provided by Medikredit/Mediscor, March 2020]

Schemes Pay: <u>Medicine</u> on script of PCDT where PCDT BHF is captured in Prescriber field	
Alliance-Midmed Medical Scheme	Medipos Med Scheme
Bestmed Medical Scheme	Momentum Health
Building & Construction Industry Med Aid Fund	Motohealth Care
De Beers Benefit Society	PG Group Med Scheme
Fishing Industry Med Scheme	Randwater Med Scheme
Genesis Med Scheme	Sedmed
Golden Arrows Employees' Med Fund	Selfmed Med Scheme
Grintek Electronics Med Scheme	Topmed Med Scheme
Hosmed Med Aid	Transmed Med Fund
Imperial Group Med Scheme	Wooltru Healthcare Fund
Makoti Med Scheme	



Payment of PCDT services by Medical Schemes

Medical Schemes paying for PCDT claims

[as provided by Discovery, June 2020]

We were just able to complete the roll-out of the first part of the project, (nurse consultations and GP video calls) in pharmacies before COVID-19 hit. The pandemic necessitated different priorities and with the lower PCDT figures it gave way to COVID -19 needs. The project has been re-scheduled for end Feb 2021.

Proposed consultation fee: R175.00



Payment of PCDT services by Medical Schemes

Why are so few Schemes recognizing and paying for PCDT claims?

Reason mostly provided: “Cannot create expectation amongst members to use PCDT pharmacists if “footprint” consists of only app 100+ pharmacists / pharmacies available in the whole of South Africa”



Conclusion

**“It always seems impossible until its done”
(Mr Nelson Mandela)**

Primary Care Drug Therapy (PCDT) could and should be part of the services provided by pharmacists on a Primary Health Care level. More pharmacy schools must be allowed / accredited to provide the supplementary training required until such training is included in the curriculum for pharmacists.

Other ways and means should be explored to allow access for PCDT pharmacists to all medicines included in the PHC EML / STG without the need to apply for a Section 22A(15) permit



Questions?

