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Ms Charmian Runciman
Scottish Executive Health Department
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Date 28 April 2006
Your Ref
Our Ref AT/KM/0401

Enquiries to Professor W J Wells
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Dear Ms Runciman,

CONSULTATION ON REVIEW OF NHS PRESCRIPTION CHARGES AND EXEMPTION ARRANGEMENTS IN SCOTLAND

Thank you for allowing us the opportunity to comment on this consultation. NHS Tayside Area Drug and Therapeutics Committee has prepared this reply on behalf of NHS Tayside. This response may be made public and the Respondent Information Form attests to this.

We believe the current system is inequitable and in need of radical change. We support the case for the retention of prescription charges for those who can afford to pay, as this will maintain an income stream for the NHS and avoids the potential destabilisation of the community pharmacy over the counter (OTC) market and the Minor Ailment Scheme (MAS) of the new community pharmacy contract.

Nevertheless, there are patients who qualify for free prescriptions who can afford to pay and patients on low incomes or with severe medical conditions who face hardship because they do not qualify under existing exemption arrangements.

Any attempt to review the list of medical conditions and reduce it will be fraught with difficulties whereas extending the list may prove costly. It would seem more appropriate to concentrate efforts on ability to pay. This would require SEHD to make arrangements to extend the exemptions categories for income where necessary or introduce systems to enable costs to be borne more easily, including changes to the prepayment certificate scheme and extension of exemptions. Any changes to the system should avoid unnecessary bureaucracy, nor cause additional barriers to patients accessing medicines. Our answers to the questions posed reflect this overview.

Exemptions related to medical conditions

Views are sought on:

- 1. Whether exemption from all charges should continue to be given on medical grounds alone, and if so, whether the list of conditions should be reviewed.**
- 2. Whether, where exemption is given on medical grounds, that exemption should relate only to drugs for the treatment of the medical condition in question, rather than (as at present) covering all drugs whether or not they relate to the condition that gives rise to the exemption.**
- 3. Whether it makes more sense to provide exemption based on a list of drugs, or based on a list of conditions.**

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Chairperson, Mr Peter Bates
Chief Executive, Professor Tony Wells

NHS Tayside believes that any new exemption categories should not be based on a list of medical conditions or a list of drugs but on ability to pay.

Exemptions related to economic need – affordability

Views are sought on:

- 1. Whether prescription charge exemption should be extended to HC3 holders.**
- 2. What changes to the PPC system would address current barriers to its use, particularly by those on low income, and maximise patients' benefit.**

The current system is inequitable and the extension should apply to HC3 holders. To address current barriers, particularly for those on low income, retrospective purchase of a PPC should be made possible. A further option would be to allow payment by instalment.

Views are sought on:

- 1. Whether there should be a reduced flat fee for all (with current income-based exemptions) and, if so, the level at which affordability to the patient and cost to the NHS can be balanced.**
- 2. Whether there should be a monetary cap to the charges that a patient is required to pay over a set period of time, after which prescriptions should be free within this period of time.**
- 3. Whether there should be a concessionary rate for patients who require frequent prescriptions and whether the concession should be triggered by the costs incurred over a set period of time.**
- 4. Whether there are other changes in the arrangements for pre-payments or caps that are not listed above and which would maintain charge income in general for NHS Boards.**

There is a need to take a full economic evaluation of these options, but if the case is attractive then a low flat fee combined with a cap should be considered.

Views are sought on:

- 1. Whether there is a case for extending the current 'full time student' threshold to cover tertiary education.**
- 2. Whether exemption should be extended to all persons in full time education or training, regardless of their ability to pay.**
- 3. Whether there should be concessionary charge arrangements for full time students or trainees above set age thresholds.**
- 4. Whether there are other changes in the charging system that could remove the need for special arrangements for full time students or trainees?**

The grounds for exemption for students should be based on ability to pay. Full time education may be used as a proxy for low income but an age related exemption is not supported.

Yours sincerely

Professor Tony Wells
Chief Executive

RESPONDENT INFORMATION FORM: REVIEW OF NHS PRESCRIPTION CHARGES AND EXEMPTION ARRANGEMENTS IN SCOTLAND

Please complete the details below and return it with your response. This will help ensure we handle your response appropriately. Thank you for your help.

Name: Professor W J Wells

Postal Address: Chief Executive, Tayside NHS Board, Kings Cross, Clepington Road, Dundee DD£ 8EA

1. Are you responding: (please tick one box)
- (a) as an individual go to Q2a/b and then Q4
- (b) **on behalf of** a group/organisation

INDIVIDUALS

- 2a. Do you agree to your response being made available to the public (in Scottish Executive library and/or on the Scottish Executive website)?

Yes (go to 2b below)

No, not at all We will treat your response as confidential

- 2b. **Where confidentiality is not requested**, we will make your response available to the public on the following basis (**please tick one** of the following boxes)

Yes, make my response, name and address all available

Yes, make my response available, but not my name or address

Yes, make my response and name available, but not my address

ON BEHALF OF GROUPS OR ORGANISATIONS:

3. The name and address of your organisation *will be* made available to the public (in the Scottish Executive library and/or on the Scottish Executive website). Are you also content for your **response** to be made available?

Yes

No

SHARING RESPONSES/FUTURE ENGAGEMENT

4. We will share your response internally with other Scottish Executive policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for the Scottish Executive to contact you again in the future in relation to this consultation response?

Yes

No