



香港藥學服務基金  
Hong Kong Pharmaceutical Care Foundation

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Dr Hon LEUNG Ka-lau, JP  
Chairman  
Panel on Health Services  
Legislative Council  
HKSAR

**Legislative Proposals to Enhance the  
Regulation of Pharmaceutical Products in Hong Kong  
10.12.2013**

Dear Dr. Hon. Leung & Legco Health Panel members,

Regarding the 75 recommendations proposed by the Review Committee and the corresponding proposed amendments to the Pharmacy & Poisons Ordinance, the Hong Kong Pharmaceutical Care Foundation (PCF), a social welfare and non-profit making organisation established in 2007 which has been providing the Visiting Pharmacists Service (VPs) to the Residential Care Homes for the Elderly (RCHes) since June 2010 with the policy support under the Labour and Welfare Bureau (LWB) subsidized servicing contract, wishes to make our comments to the **Recommendation 30: Registered pharmacist should be present at authorised seller of poisons (“ASP”) whenever an ASP is open for business.**

### **Background**

The Hong Kong Pharmaceutical Care Foundation has submitted a request to the Hong Kong Government at the open consultation (Medical & Health Service Sector) on November 18<sup>th</sup> 2013 to support at the government policy level to put in place in Hong Kong a new integrated model of Visiting Pharmacists and Drug Dispensing and Packaging Service for the Residential Care Home for the Elderly (RCHes), Rehabilitation Centres and the individual elderly residing in the community.

### **The VP Service**



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Under the VP service, visiting pharmacists make regular visits to the RCHEs on a weekly basis and they help to manage most common medication problems at the RCHEs. Their scope of services include the proper keeping of residents' medication records; making suggestions on how to improve on drug storage conditions; training the carers to enhance their compliance to the Social Welfare Department (SWD) operational guideline on 3 checks and 5 rights proper drug documentation; appropriate drug disposal, and encourage staff to report on "near misses" and medication incidents. Most importantly, the carers have a better understanding in drug safety and pay more attention in their daily operations such as drug dispensing, checking and administration processes.

The PCF has already served over 100 RCHEs and more than 10,000 residents in the last 4 years. However, PCF has recognised that the ultimate and a total solution to minimise and avoid medication errors in these homes and in the community is to find a better and more sustainable solution on the drug dispensing and packaging service. So, in March 2013, the PCF has decided to invest its resources again by introducing an automated drug dispensing and packaging system to address the "drug safety" issues at the RCHEs, rehabilitation centres and for the individual elderly residing in the community.

This service is modeled on the experience of the Singapore (please see Appendix I) where the system packs medicines for patients according to the time they are to be taken, rather than by drug types, using a medication management software linked to the residents' electronic medication records system and tablet dispensing robot machines. (please see Appendix II on the explanation of the System)

## **The Establishment of a Standard Drug Delivery Model in the "Safe-Med" Dispensary / the authorized seller of poisons ("ASP")**

The "Safe-Med" Dispensary consists of the following servicing functions:

### **I) Visiting Pharmacists to perform Medication Reconciliation Service**

The visiting pharmacists will review, reconcile, build and update the residents' medication profile to ensure that the profile is complete and appropriate so as to eliminate drug duplication or any unintended or inappropriate dosages leading to drug interactions and incidents; and to prepare the full list of medications with clear drug images, names, dosage and frequency for drug administration.

### **II) Drug Dispensing and Packaging Service**

Pharmacists will set up and supervise the operation of drug dispensing and packaging service in the dispensary where automated dispensing machines will be utilised to





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prepare multi-dose packs for each of the residents according to the times of administration. The system will link residents' medication profile with the dispensing robotic machines and will comply with the Department of Health regulatory requirements and Good Dispensing Practice standard. In order to prevent possible drug incidents in the drug administration process, the multi-dose packs will have barcoding for the carers to scan and verify to ensure the right person to receive the right drug by the right route at the right times and who has performed the drug administration process for documentation and record keeping purposes.

## **The Benefits**

With the professional services provided by VP on medication management at the RCHEs and the set up of the "Safe-Med" Dispensary with an automated Drug Dispensing and Packaging System, the drug safety in the community will be significantly improved. Duplication in drug dispensing efforts at both the hospital and the RCHEs levels will be avoided with a reduction in drug wastage. Errors in transcribing of drug data from institutions to residential homes will be eliminated. The multi-dose packs will help to reduce the workload of the carers, health workers and nurses at the RCHEs and rehabilitation centres enabling these staff to render better nursing care for residents. Furthermore, this new integrated model working under the Public Private Partnership Program can help the Hospital Authority to shorten the long waiting time at both of the outpatient clinics and the dispensaries.

## **The Implementation**

The "Safe-Med" Dispensary will work with the Hospital Authority, the Department of Health and the Social Welfare Department who have been well informed about this set up and have already paid visits to the drug dispensing and packaging service centre. It is necessary to point out that we all share the same concern on a common issue which can be solved with the policy support from the Hong Kong Government so that important operational matters such as the sharing of the patients medication records between the Hospital Authority and the drug packaging centre and the direct drug supply from the Hospital Authority's contract suppliers to the drug packaging centre can be facilitated at policy level.

## **Our Role & Support**

We would like to stress that the PCF is a charitable organisation and it is our social responsibilities to contribute to the community. We have already succeeded in the provision of the VPs with the policy support since June 2010 and now with our



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pioneer set up of the automated Drug Dispensing and Packaging Centre, we believe through the Public Private Partnership Program with the policy support from the Government is the ultimate long term solution in the management of drug safety problems in Hong Kong at the community level. With this commitment by the PCF in the establishment of a **Standard Drug Delivery Model** in the "Safe-Med" Dispensary, our pharmacists working for the PCF should be present at all time and fulfil the 3/3 attendance requirement as per administrative response to the recommendation 30.

### Inquiries

For any details about our organization, please visit the website [www.pcfhk.org](http://www.pcfhk.org). For any details about this submission, please contact the undersigned [kimng@pcfhk.org](mailto:kimng@pcfhk.org) or at telephone number:

Yours faithfully,

Kim Wah NG  
Chairperson  
The Hong Kong Pharmaceutical Care Foundation





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## Appendix I

Published March 18, 2013 (Business Times, Singapore)  
Drug packing system wins top IT award  
BY AMANDA TAN

The Multi-dose Medications Management System has won the regional CIO Award, which is given yearly to five organisations. A NEW system built in Singapore that packs medicines according to the time that patients take them has clinched a regional award for breaking new ground by using IT system to add value to customers.

The Multi-dose Medications Management (MMM) System, developed by the National Healthcare Group (NHG) Pharmacy and the Integrated Health Information Systems (IHIS), the Health Ministry's IT arm, has won the regional CIO Award which is given yearly to five organisations.

The MMM system packs medicines for patients according to the time they are to be taken, rather than by drug types, using a medication management software linked to NHG's electronic medical records system and tablet dispensing robot machines. The system has also been awarded Merit Award in the Health Ministry's Health's EXCEL Best Innovative Project, among others.

The MMM system enables a typical 200-patient nursing home, which previously required 17 man-hours a day for medication management, to save up to 2.5 full-time equivalents (FTE) of nursing manpower. "The system will play a significant role in helping the limited pool of healthcare staff cope with the rapidly increasing numbers of elderly with chronic diseases, and provide quality patient care outside hospitals," said Chan Soo Chung, executive director, NHG Pharmacy.

It also helps patients and their caregivers keep track of the various medications they have to take, especially for patients with multiple long term illnesses, as well as improves medication safety because the sachets help to ensure the right medicines are taken at the right time and in the correct dosages. "The MMM System makes it easier for patients to manage their medications and empower them to live independently at home and in the community," said Ms Chan.

The MMM system is used in 16 nursing homes and four long-stay wards in the Institute of Mental Health, as well as being used in pilot trials at polyclinics in Hougang, Jurong and Toa Payoh.

To complement the system, pharmacists will help to counsel and identify patients who will be able to opt for the service at a nominal charge.

NHG Pharmacy plans to introduce the MMM system in more nursing homes and progressively in the nine national healthcare group polyclinics.