

ACMD

Advisory Council on the Misuse of Drugs

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Parliamentary Under Secretary of State for Public Health and Primary Care
Department of Health
39 Victoria St
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02 May 2018

Dear Ministers,

RE: Further advice on Independent prescribing of controlled drugs from a restricted list by therapeutic radiographers

I write further to the Advisory Council on the Misuse of Drugs' (ACMD's) advice of 5th September 2016 and 19th January 2017 in relation to independent prescribing from a restricted list of controlled drugs by therapeutic radiographers.

The ACMD invited NHS England to the meeting of its Technical Committee on the 8th March 2018 to discuss its outstanding concerns with the proposal. These were summarised in our previous letter as:

- Development of dependence with potent or high dose drugs.
- Lack of assurance training includes not only 'actions and potential side effects' but also how to identify and manage them.
- Further assurances that training will be provided on identification, assessment and avoidance of dependence and how to manage patients with existing dependence.

In this meeting, it was clarified that all prescribers would have to complete the same training regardless of background in order to be considered competent. This training would fit three curriculum frameworks which received input from the Royal Pharmaceutical Society, and include training on misuse, adverse drug reactions, and dependence. There would also be discussion on variable drug metabolism and other common considerations for prescribers. We were assured that the curriculum was comprehensive in identifying and managing the above.

Prescribers would have a “personal formulary” of drugs they are able to prescribe, which would be assessed annually. As such, practitioners would need to demonstrate an awareness of, for example, benzodiazepine effects in naive patients to be allowed to prescribe them. Training would also include a minimum of 90 hours practical training which is specific to the prescriber’s practice. These requirements should be equally stringent to those for other groups of independent prescribers.

The curriculum and the personal formulary will be subject to regular review. There will be a process for NHS England’s Innovation and Research Unit to evaluate the outcomes of independent prescribing of controlled drugs by all permitted Allied Health Professions. The curriculum would be revalidated yearly in light of new recommendations.

Recommendation

We are satisfied that the Department of Health and Social Care has considered the ACMD’s concerns. Therefore, we recommend to the Home Office that the Misuse of Drugs Regulations 2001 is amended to allow therapeutic radiographers to prescribe a total of 6 controlled drugs as specified in Annex 1.

Yours sincerely,



Dr Owen Bowden-Jones

Chair of ACMD

CC: Rt Hon. Sajid Javid MP (Home Secretary)

Rt Hon. Jeremy Hunt MP (Secretary of State for Health and Social Care)

Annex 1 – List of Controlled Drugs (CDs) for independent prescribing by therapeutic radiographers

Controlled Drug	Schedule (MDR)	Route of administration
1 Tramadol	3	Oral
2 Lorazepam	4	Oral
3 Diazepam	4	Oral
4 Morphine	2 & 5	Oral & Injection
5 Oxycodone	2	Oral
6 Codeine	5	Oral