



Australian Government

Comcare

# COMCARE PHARMACY POLICY

Comcare can pay for the appropriate cost of medications prescribed by a legally qualified medical practitioner (LQMP) for the treatment of an injured employee's compensable condition <sup>1</sup>.

## MEDICATIONS COMCARE CAN PAY FOR

Comcare can pay for the appropriate cost of medications which are:

- requested or prescribed by a medical practitioner or registered dentist.
- provided by a registered pharmacist.
- reasonably required due to a compensable condition.
- provided in accordance with the Pharmaceutical Benefits Scheme (PBS) <sup>2</sup>.
- provided as a 'private /off label prescription' if the medicine is clinically appropriate and not available on the PBS.

## MEDICATIONS COMCARE WILL NOT PAY FOR

Comcare will not pay for medications:

- that a medical practitioner did not prescribe (in the case of prescription medicines)
- that a medical practitioner did not recommend (in the case of non-prescription/over the counter items)
- for a person other than the injured employee
- for which there is no clinical justification.
- that are not related to the accepted workplace injury or illness.
- are prescribed as part of a clinical trial.
- that were required prior to the accepted workplace injury or illness unless the dose levels increase as a direct result of the work-related injury or illness.

## PBS MEDICATIONS

Injured employees can receive medications under the PBS. Where an injured employee is entitled to access the PBS, Comcare will fund all patient contributions set out in the PBS, including brand or therapeutic premiums.

Where a medical practitioner prescribes a quantity over the PBS limit for prescribed medications an authority from Services Australia is required.

## NON-PBS (PRIVATELY /OFF LABEL PRESCRIPTION) MEDICATIONS

Medications should be prescribed under the PBS when clinically appropriate and available. Comcare can pay for non-PBS (private/ off label prescription) medications if the medications are clinically appropriate for the work-related injury or illness and there are no readily available alternatives on the PBS.

## OVER THE COUNTER ITEMS

Over the counter (OTC) items include medications and non-drug pharmacy items. These items can be sold by a pharmacist without a prescription. This includes analgesics and laxatives, dressings, bandages, mobility aids and supports. Comcare can pay the appropriate cost of OTC items:

- required as a result of a work-related injury or illness.
- requested and supported by written clinical rationale from a legally qualified medical practitioner.

Comcare may pay for over the counter items if it is clinically justified by the prescribing medical practitioner, in accordance with current clinical practice guidelines.

Comcare will pay for over the counter items per advice provided by the Therapeutic Goods Administration <sup>3</sup>.

## COMPLEMENTARY MEDICATIONS

Comcare medications include vitamins, minerals, herbal remedies, and nutritional supplements. Comcare can pay the reasonable costs of complementary medications which are:

- required as a result of a work-related injury or illness.
- requested and supported by a written clinical rationale from a registered medical practitioner or dentist.

## SCHEDULE 8 MEDICATIONS

Comcare will pay for Schedule 8 medications for a maximum of 2 months<sup>4</sup>, when they are prescribed through the PBS. Schedule 8 medications are subject to a high risk of abuse. As such, the prescribing medical practitioner is expected to obtain a permit to prescribe the Schedule 8 medication via Services Australia. A copy of the permit obtained by the prescribing medical practitioner should be provided to Comcare.

Paying for these on private scripts reduces the effectiveness of the governmental systems in place to monitor their use.

If a medical practitioner believes a PBS medication is not suitable or must be prescribed for more than 2 months, the medical practitioner must provide written clinical justification to Comcare for consideration prior to prescribing the medication. If Comcare does not accept liability based on the justification provided, the injured employee is responsible for the cost of the Schedule 8 medication.

## COMPOUNDED PHARMACEUTICAL PRODUCTS

The compounding of pharmaceutical products is highly regulated in Australia.

Compounded pharmaceutical products may include medications, suppositories and topical creams. Comcare may pay the reasonable costs of compounded pharmaceuticals which are:

- required as a result of a work-related injury or illness.
- requested and supported by a written clinical rationale from a registered medical practitioner or dentist.
- when it is clinically demonstrated that a commercially available/off the shelf product is not suitable.

Due to the nature of compounded pharmaceutical products, Comcare will require a copy of the script, proposed cost (if available) and clinical justification outlining the rational for a compounded pharmaceutical product as opposed to a commercially available product.

Upon receipt of this information, the Claims Manager must refer the claim to the Clinical Panel for liability determination in regard to the compounded pharmaceutical product/s.

## MAXIMUM THERAPEUTIC DOSE

Comcare will only pay for medications up to the maximum therapeutic dose as recommended by the manufacturer.

Note: The prescribing medical practitioner must obtain an authority from Services Australia if they are prescribing more than the maximum therapeutic dose for prescription medicines on the PBS. Comcare will not pay for a private script in this situation.

## QUANTITY RESTRICTIONS

Pharmacists must supply medications—particularly medications where addiction and tolerance are a risk—according to the medical practitioner’s instructions. If the injured employee requires an increase in the prescribed quantity, the pharmacist should refer them back to their medical practitioner for a prescription to cover exceptional circumstances.

Comcare will only pay for larger than usual quantities of medications in exceptional circumstances if:

- Comcare is provided written clinical justification to enable assessment of whether to accept liability.
- the maximum quantity of medications to be paid for does not exceed the dosage to be taken over 12 weeks, and/or
- the prescription is endorsed by the medical practitioner in accordance with Regulation 24 of the PBS Guidelines for dispensing repeat quantities.

## CLAIMING PHARMACY EXPENSES

An Injured employee seeking reimbursement of pharmaceutical expenses must provide original receipts from a registered pharmacy and attach these to a Comcare [Medical services claim form](#) for Comcare to process a claim for medications.

# COMCARE PHARMACY PRICING POLICY

## PBS MEDICATIONS

Where an injured employee is entitled to access the PBS, Comcare will fund all patient contributions set out in the PBS, including brand or therapeutic premiums i.e. the maximum price to the consumer <sup>5</sup>.

## NON-PBS (PRIVATE/OFF LABEL PRESCRIPTION) MEDICATIONS

Where injured employees are not eligible for access to the PBS, Comcare will pay the appropriate cost of the required prescription medications.

For non-PBS private/off label prescriptions, Comcare can pay a maximum mark-up on the wholesale price of up to 25 per cent plus a dispensing fee.

## OVER THE COUNTER ITEMS

Mark-ups are exclusive of GST, which may be added to the marked-up price where applicable.

Dispensing fees are not paid for over the counter items supplied by a pharmacist that are not on the PBS, as this is not considered to be a reasonable cost.

If a doctor prescribes an over the counter item listed on the PBS, the pharmacist is entitled to dispense the item through the PBS and invoice Comcare for the patient contribution.

NDPSC Classification <sup>6</sup>	Mark Up	Dispensing Fee
No classification of Schedule 2	Up to 50% above the wholesale price	None
Schedule 3 (pharmacist only)	Up to 75% above the whole sale price	None

## SCHEDULE 8 MEDICATIONS

Comcare will pay for Schedule 8 medications for a maximum of 2 months, when they are prescribed through the PBS.

If a S8 medication has been prescribed privately of for greater than 2 months, please contact Comcare to confirm liability acceptance.

## COMPOUNDED PHARMACEUTICAL PRODUCTS

The compounding of pharmaceutical products is highly regulated in Australia.

Due to the nature of compounded pharmaceutical products, Comcare will require a copy of the script, proposed cost (if available) and clinical justification outlining the rationale for a compounded pharmaceutical product as opposed to a commercially available product. Please contact Comcare to confirm liability acceptance.

## DIRECT BILLING ACCOUNTS

Any direct billing account submitted to Comcare for payment must contain the following information:

Payee Details	Patient details	Medication details
Pharmacy name	Family name and given name(s)	Date dispensed
Billing address	Address	PBS item code number (if applicable)
Payment address (if different to the business address)	Claim number (if not known then provide patient's date of birth and date of accident)	A copy of the original script for private script medications
Invoice number and date		A copy of the repeat authorisation, where appropriate (for private medications only)
Total amount charged		Full description of item (including script number, brand name and medication form)
		Quantity of medication dispensed.
		Medication strength (where applicable)
		Amount charged per item

## ACCOUNT SUBMISSION

Healthcare providers can submit their workers' compensation claim-related invoices following service provision, to Comcare for payment in three ways:

- **Digitally** via [Tyro Health](#) - This is our preferred invoicing method, and the quickest way to get paid. Tyro Health is a secure digital payment platform used by healthcare providers. Free to join, Tyro Health makes invoicing Comcare simpler for providers and payment is quicker.
- **by email** at [general.enquiries@comcare.gov.au](mailto:general.enquiries@comcare.gov.au)
- **by post** to Comcare, GPO Box 9905, Canberra ACT 2601

Please note, if you submit your invoices to Comcare by email or post, processing and payment may take longer.

Accounts should be a dispensary computer-generated tax invoice and must be addressed to Comcare. The type of item—for example, over the counter (OTC)—may be handwritten onto the tax invoice.

Before submitting an account to Comcare:

- ensure the injured employee has an accepted Comcare claim.
- check that only one name appears on each account.
- remove receipts or client history reports.
- attach the dispensary computer-generated tax invoice to your Tyro submission as this will facilitate faster review and processing of your invoice.

Please refer to <https://www.comcare.gov.au/service-providers/invoicing-and-payment> for further information regarding invoicing Comcare as a means of reconciling workers' compensation claim-related services

## PRIVACY INFORMATION

For information about how we manage personal information, please visit [www.comcare.gov.au/privacy](http://www.comcare.gov.au/privacy) or contact us on 1300 366 979 and request a copy of our Privacy Policy.

## REFERENCES

1. Safety, Rehabilitation and Compensation Act 1988 (sections 4 and 16).
2. Pharmaceutical Benefits Scheme. As retrieved 12/04/2024 via <https://www.pbs.gov.au/pbs/home> and <https://www.health.gov.au/cheaper-medicines>
3. Department of Health and Aged Care: Therapeutic Goods Administration. (2023). Scheduling of medicines and poisons. As retrieved 12/04/2024 via <https://www.tga.gov.au/how-we-regulate/ingredients-and-scheduling-medicines-and-chemicals/poisons-standard-and-scheduling-medicines-and-chemicals/scheduling/scheduling-medicines-poisons>
4. Royal Australian College of General Practitioners. (2021). Prescribing drugs of dependence in general practice: Part A – Clinical Governance Framework – Chapter 2; Laws and regulations. As retrieved 12/04/2024 via <https://www.racgp.org.au/clinical-resources/clinical-guidelines/key-racgp-guidelines/view-all-racgp-guidelines/drugs-of-dependence/part-a/laws-and-regulations>
5. Services Australia. (2023). PBS for pharmacists. As retrieved 11/04/2024 via [https://www.humanservices.gov.au/organisations/health-professionals/services/medicare/pbs-pharmacists?utm\\_id=9](https://www.humanservices.gov.au/organisations/health-professionals/services/medicare/pbs-pharmacists?utm_id=9)
6. National Drugs and Poisons Scheduling Committee (NDPSC) administered by the Therapeutic Goods Administration.