



**Australian Government**

**Department of Health, Disability and Ageing**

# **MEDICATION PROGRAM FOR HOMELESS PEOPLE GUIDELINES**



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# 1. Introduction

## Background

The Continuing Medication Program (CMP), now known as the Medication Program for Homeless People, was first established in 1990 in response to the introduction of a patient co-payment for pharmaceuticals on the Pharmaceutical Benefits Scheme (PBS). The program is administered under Section 100 of the *National Health Act 1953*.

Concerns were raised by welfare agencies about the adverse effects a patient co-payment would have on homeless people who are not able to afford appropriate medical treatment. A lack of health care for homeless people could potentially lead to significant long term health and social costs for the community. The program enables eligible people who are homeless to access their essential PBS medicines with no out-of-pocket costs.

## Outcomes of Internal Review of CMP

A recent Department of Health internal review identified the CMP program model did not align with current legislative and financial frameworks and was administratively burdensome. The internal review also noted that improvements could be made to the program to update its operations, improve efficiency and simplify the claiming process to reduce the burden for participating not-for-profit organisations and community pharmacies.

## Changes to the program as of 1 July 2021

From 1 July 2021, the name of the program - Continuing Medication Program was changed to the Medication Program for Homeless People, to better reflect the intent of the program. Administrative changes to the program were also made to reduce the burden on not-for-profit organisations and community pharmacies participating in the program.

Under the improvements to the program, the claiming process for the PBS concessional co-payment is simplified to reduce the administrative burden on participating not-for-profit organisations and community pharmacies. The community pharmacy is no longer required to maintain an account with an approved not-for-profit organisation nor invoice them on a monthly basis. As part of the enhancements, the eligible homeless client's co-payment will be automated through PBS Online.

The program is now legally underpinned by the *National Health (Medication Program for Homeless People) Special Arrangement 2021* (PB 73 of 2021) (the Special Arrangement). A copy of this is available at [National Health \(Medication Program for Homeless People\) Special Arrangement 2021 \(legislation.gov.au\)](https://www.legislation.gov.au/idx/instruments/2021/0073).

### **1.1 Objectives**

The objectives of the program are to assist people who are homeless and are considered incapable of managing their own affairs, to continue receiving and taking their PBS medication where non-medication could lead to undesirable medical or social consequences.

### **1.2 Funding**

The Medication Program for Homeless People is funded by the Australian Government to provide eligible homeless people with PBS medicines with no out-of-pocket costs.

## 2. Eligibility Requirements

The following eligibility requirements exist for organisations, community pharmacies and clients.

### 2.1 Organisation

To be approved to participate in the Medication Program for Homeless People, organisations need to complete an application form which will be assessed by the Department of Health. Eligible organisations must:

- be not-for-profit;
- be providers of services/care to homeless people;
- not be receiving other funding for pharmaceutical or other healthcare services from the Australian Government;
- nominate a community pharmacy/pharmacies who will dispense the eligible client's prescription;
- assess each client's eligibility to participate in the program using the criteria outlined in the legislative instrument and in section 2.3 of this document;
- annotate an eligible patient's PBS prescription with the approval number, which the Department of Health will provide them with;
- decide at a local level, whether the eligible patient takes their annotated PBS prescription directly to the nominated pharmacy themselves, **OR** whether a representative from your organisation will act as an 'agent' for the eligible patient by taking their annotated PBS prescription to the nominated pharmacy and then providing the medicine to the eligible patient; and
- ensure PBS medication is only supplied to their clients who meet the eligibility requirements of homelessness under the program.

### 2.2 Community Pharmacy

The approved organisation is responsible for having a working relationship with a community pharmacy/or pharmacies to participate in the program. The approved organisation will need to confirm eligibility and suitability of a pharmacy/pharmacies to participate in the program.

Pharmacies must have the capacity to:

- ensure PBS prescriptions are properly annotated with the organisation's approval number;
- maintain safety net records for eligible patients; and
- provide service to the organisation in urgent situations.

### 2.3 Client

Eligible clients must hold a valid Medicare card and concession card.

To be an eligible client, the approved organisation must assess that the person:

- meets the below definition of Primary or Secondary Homelessness<sup>1</sup>; and

#### Primary homelessness

*People without conventional accommodation, such as people living on the streets, sleeping in parks, squatting in derelict buildings, or using cars or railway carriages for temporary shelter.*

#### Secondary homelessness

*People who move frequently from one form of temporary shelter to another. It covers: people using emergency accommodation (such as hostels for the homeless or night shelters); teenagers staying in youth refuges; women and children escaping domestic violence (staying in women's refuges).*

- is incapable of managing their own affairs to afford essential PBS medicines where lack of medication could lead to undesirable medial or social consequences.

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<sup>1</sup> Chamberlain and MacKenzie (1992). Understanding Contemporary Homelessness: Issues of Definition and Meaning. *Australian Journal of Social Issues*. 27(4):274-297

**Note:** A person is not *homeless* if the person is a care recipient of residential care within the meaning of the *Aged Care Act 1997*.

### 3. Joining the Medication Program for Homeless People

#### 3.1 Application Process for not-for-profit organisations to join the program

In order for the Department of Health to assess whether a not-for-profit organisation is eligible to participate in the program, the organisation must complete the Application Form and provide the Department with the following information:

- a statement outlining the services provided by your organisation to homeless people, including any accommodation and medical services;
- a copy of the organisation's most recent annual report;
- any additional information the organisation considers may assist in determining the organisation's eligibility under the Program; and
- details of the community pharmacy/pharmacies the organisation will use to dispense the eligible prescriptions.

**Note:** If an application from a not-for-profit organisation is refused, the applicant can request an internal merits review, which enables the Department to reconsider an application, thus ensuring procedural fairness and accountability.

### 4. Roles and Responsibilities

#### 4.1 Responsibility of the Approved Not-for-Profit Organisation

- Your organisation will be responsible for assessing a client's eligibility for the program based on the criteria outlined in the legislative instrument (and section 2.3 of this document).
- Your organisation will be required to annotate the eligible homeless person's PBS prescription with an approval number representing your not-for-profit organisation, e.g. CMP001. The Department will assign the approval number to you. In exceptional circumstances, your organisation may authorise the nominated pharmacist to annotate an eligible patient's PBS prescription.
- Your organisation will be responsible for deciding at a local level, whether the eligible patient takes their annotated PBS prescription directly to the nominated pharmacy themselves, OR whether a representative from your organisation will act as an 'agent' for the eligible patient by taking their annotated PBS prescription to the nominated pharmacy and then providing the medicine to the eligible patient.
- Your organisation will keep records for all PBS prescriptions claimed through the program. For compliance, the Department will be requiring your organisation to provide on a monthly basis, the number of PBS prescriptions that your organisation presented to a community pharmacy for dispensing under the program, and the number of prescriptions that your organisation has authorised the nominated pharmacist to annotate on behalf of your organisation.
- Your organisation must inform the Department of Health of any changes to information provided in the Application for Participation into the Medication Program for Homeless People, including but not limited to change of address, additional sites and updates to the contact officer.

#### 4.2 Responsibility of the Department:

- The Department will assess a not-for-profit organisation's eligibility to participate in the program.
- The Department will provide the organisation with the decision in writing.
- The Department will assign an approval number to organisations approved to participate in the program

- At the request of an applicant, the Department may reconsider an application under an internal merits review.
- The Department will be responsible for compliance of the program, which will include a monthly audit on the number of PBS prescriptions dispensed under the program reported by approved organisations and the data reported through PBS Online (refer to 5.10).
- The Department will be responsible for amending the Guidelines, Application Form and Legislative Instrument, as required.

## 5. Frequently Asked Questions

### 5.1 How long does it take for the Department to assess my application?

The Department's standard processing time for applications is 28 days. If the application is incomplete, or the Department requires further information/documentation to assess the application, this will be requested from the organisation in a timely manner.

The Department will notify all applicants of the outcome of their application in writing. If approved to participate in the program, the Department will provide the organisation with an approval number which the organisation will use to annotate the PBS prescriptions of eligible patients. If an application from a not-for-profit organisation is refused and the applicant requests an internal merits review, the Department can reconsider an application, thus ensuring procedural fairness and accountability.

### 5.2 What happens if someone with a concessional card has a PBS prescription but does not have any money to pay for their medication?

The organisation is required to check if the person meets the definition of homelessness as outlined in the Legislative Instrument and section 2.3 of this document. If the person does not meet any of the above definitions, then their PBS medication cannot be claimed under the program. It is a requirement of all organisations participating in the program that they continually check that their clients who are obtaining their PBS medications under the program remain eligible and meet the definitions of primary and secondary homelessness as provided by the Department of Health.

*Primary homelessness:* People without conventional accommodation, such as people living on the streets, sleeping in parks, squatting in derelict buildings, or using cars or railway carriages for temporary shelter.

*Secondary homelessness:* People who move frequently from one form of temporary shelter to another. It covers: people using emergency accommodation (such as hostels for the homeless or night shelters); teenagers staying in youth refuges; women and children escaping domestic violence (staying in women's refuges).

### 5.3 What happens after my organisation has deemed a person as eligible for the program?

Once a client has been deemed eligible by the approved organisation, a staff member will need to check that the medicines listed on the eligible client's prescription are claimable under the program. If the medicines are claimable, the staff member will then need to annotate the client's prescription with the organisation's approval number.

### 5.4 What medicine is covered under the program and where do we find out what medicines are on the PBS?

The Program applies to prescriptions for PBS General Schedule medicines only. These are PBS medicines made available under Section 85 of the National Health Act 1953 (the Act). S100 medicines are not eligible. The PBS is available online at [www.pbs.gov.au](http://www.pbs.gov.au) and the pharmacist your organisation uses will also be aware of which medications are claimable under the program and may be able to assist you.

### 5.5 How does my organisation annotate eligible prescriptions?

A staff member of the approved organisation can annotate the eligible prescription by hand by writing the approval number on the patient's prescription. Note: If prescriptions are not annotated correctly, the pharmacist will not be able to dispense the PBS prescription as a valid Medication Program for Homeless

People prescription. In exceptional circumstances, the approved organisation may authorise the nominated pharmacist to annotate an eligible patient's PBS prescription.

#### **5.6 What if there is more than one medicine listed on the one prescription?**

If there is more than one medicine listed on one prescription, your organisation will need to check that each medicine listed is eligible for the program. If so, you can annotate the prescription with your approval number. **However you will need to ensure that your record-keeping reflects the number of medicines listed on the prescription.**

#### **5.7 What is the procedure for repeat prescriptions?**

Repeat prescriptions should not be annotated by your organisation at the same time as the original prescription. As a client's homelessness status can frequently change, a patient must be assessed by the approved organisation **prior to** each PBS prescription being dispensed, including repeat prescriptions.

#### **5.8 Who can take the eligible prescription to the pharmacy?**

Your organisation can decide at a local level, whether the eligible patient takes their annotated PBS prescription directly to the nominated pharmacy themselves, **OR** whether a representative from your organisation will act as an 'agent' for the eligible patient by taking their annotated PBS prescription to the nominated pharmacy and then providing the medicine to the eligible patient.

#### **5.9 How does the pharmacy claim the prescription?**

Pharmacies will need to check prescriptions are correctly annotated with the approval number. If not, they may need to contact the approved organisation for confirmation.

The pharmacy must record the approval number annotated on the prescription in the Pharmacy Dispensing System prescription record. The approved pharmacy dispenses the client's medicine and the claim/PBS concessional co-payment is automatically processed through PBS Online.

If the annotation is valid, the cost of the PBS medicine supplied, including the PBS concessional co-payment relief amount, will be paid to the pharmacy.

#### **5.10 What happens if a client wants a more expensive brand of a medication, rather than the generic brand?**

The Department will only pay the PBS concessional co-payment rate. The current concessional co-payment can be found at [pbs.gov.au](http://pbs.gov.au). It is indexed annually and the new rate applies from 1 January each year. The following items are not reimbursed under this Program:

- administrative fees;
- where a client arrives at the Concessional Safety Net Threshold. Further items should be supplied free of charge for the remainder of the calendar year, ending the claim for assistance under the Program.
- Brand Price Premiums or Therapeutic Group Premiums included in the cost of the prescription. Under these arrangements the patient pays the difference for higher priced brands or items. These are extra charges that are paid by the patient in addition to the usual PBS co-payment.
- Repatriation Pharmaceutical Benefits Scheme (RPBS) prescriptions as the Department of Veteran Affairs is responsible for these compensatory benefits and they do not receive a subsidy under the Medication Program for Homeless People.
- other prescriptions not subsidised under the PBS, e.g. dressings, vitamins or private prescriptions.
- Closing the Gap (CTG) prescriptions as these are funded through a different program.

#### **5.11 What happens if a client wants an item that is not on the PBS?**

The Medication Program for Homeless People applies to PBS items listed in the General Schedule and Extemporaneously Prepared items on the PBS. The PBS can be found at [www.pbs.gov.au](http://www.pbs.gov.au). Non-PBS items

such as vitamins, supplements, band aids etc. cannot be paid for under the program. It is a decision for your organisation whether to purchase non-PBS items for clients, however these items will not be funded through the program and therefore not paid by the Commonwealth.

#### **5.12 Does my organisation need to provide data to the Department of Health?**

All approved organisations must keep records of the number of PBS prescriptions and medicines claimed through the program. The Department requires approved organisations to provide, on a monthly basis, the number of PBS prescriptions that your organisation presented to a community pharmacy for dispensing under the program, and the number of prescriptions that your organisation has authorised the nominated pharmacist to annotate on behalf of your organisation. There is a monthly reporting template provided to all approved organisations.

#### **5.13 Will our organisation be audited?**

Approved organisations will need to ensure they maintain accurate records in relation to claims made under the program.

#### **5.14 What if my organisation is approved to participate in the program, but then our circumstances change?**

All approved organisations must advise the Department of Health in writing of any change in circumstance that may affect your organisation's eligibility to participate in the program.

## **6. Contact Details**

Medication Program for Homeless People  
PBS S100 Programs Section  
Pharmacy Branch  
Department of Health  
Email: [cmpprogram@health.gov.au](mailto:cmpprogram@health.gov.au)