



ACT Medicines Advisory Committee

Locked Bag 5005

Weston Creek

Canberra ACT 2611

Email: hps@act.gov.au

Health Care Consumers' Association ACT INC
100 Maitland Street, HACKETT ACT 2602
Phone: 02 6230 7800 Fax: 02 6230 7833
Email: adminofficer@hcca.org.au
ABN: 59 698 548 902
hcca.org.au | hcca-act.blogspot.com |
facebook.com/HCCA.ACT | [@HealthCanberra](https://twitter.com/HealthCanberra)

Re: Invitation to Comment-Guidelines for prescribing amphetamines for Attention Deficit Hyperactivity Disorder (ADHD)

The Health Care Consumers' Association (HCCA) of the ACT was formed over 30 years ago to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision making. Canberra & Queanbeyan ADD Support Group, Inc. (ADDACT) is a member of HCCA and we have sought advice from them in framing this response.

HCCA supports the position of ADDACT in recommending the use of the wording **psychotropic medications** as opposed to **amphetamines**, as amphetamines are not the only medications used for the treatment of ADHD.

All psychotropic medications should be used with caution in small children. HCCA believes the current guideline represents a justifiably cautious approach to the medication of young children, but we suggest the new guidelines emphasise the fact that the use of non-stimulants should be just as carefully controlled as the use of stimulants and that this applies to all psychotropic medications.

HCCA also strongly supports ADDACT's position of the need to review the requirement for double diagnosis ADHD in adults, which creates a huge barrier for those seeking care and treatment for ADHD in the ACT, possibly resulting in under-treatment. This requirement imposes a huge out-of-pocket cost to the consumer as seeing two specialists can be extremely costly. There is often also delays in treatment due to prolonged waiting time for each specialist. HCCA strongly advocates for the modification of this requirement as it directly impinges on those with ADHD's charter rights of Access and Safety and Participation according to the Australian Charter of Health Care Rights. The ACT community will benefit from these suggested changes as they create opportunities for more people to undergo treatment each year.

ADHD in adults has been found to affect men and woman equally. Within the ACT, only small fraction of people are seeking or receiving effective treatment for adult ADHD. Untreated ADHD is directly associated with increased anxiety, depression,

anti-social behaviour and suicide, meaning that barriers to treatment could result in negative public health outcomes.

Given the shortage of psychiatrists in the ACT currently offering treatment for ADHD both in children and in adults, a suggested solution lies in allowing that the continuation of therapy by general practitioners. However further training of the GP workforce is needed through an education program to bring ADHD awareness to general practitioners. This is particularly important in relation to small children whose behaviour is a much more frequently observed by general practitioners as their family doctors and who are in the position to make referrals to specialist practitioners, child psychiatrists and paediatricians.

As there is shortage of psychiatrists in the ACT currently offering treatment for ADHD, many consumers have to travel to Victoria or Sydney for treatment. This poses a huge cost to the consumer in regards to travel, accommodation, time lost from work or school, and the cost of the appointment itself. A further concern is the inability for NSW and Victorian practitioners to issue prescriptions under an ACT Authority to Prescribe without having an ACT Provider Number. This Provider Number can only be obtained if a practitioner has a registered business premises in the ACT, which is rare. This limitation appears to be unique to the ACT and has implications for ACT residents who are forced to seek treatment in NSW or Victoria for their ADHD issues because of the lack of professionals that treat those with ADHD within ACT.

HCCA strongly supports the position of ADDACT in the need for review of these guidelines and believes these changes ensures clarity in current protocols and practice, and increases people's choice, opportunity and access to treatments and medicines that offer effective management of ADHD and its associated effects.

Should you require any further comments regarding our comments, please contact HCCA's Policy Officer; Eleanor Kerdo eleanorkerdo@hcca.org.au

Yours sincerely,



Darlene Cox
Executive Director
Health Care Consumers' Association

12 June 2014