



20<sup>th</sup> May 2019

Circular 020/19

**RE: GMS SCHEME – NON-DISPENSING FEE CLAIMS**

Dear Pharmacist,

The Health Professionals (Reduction of Payments to Community Pharmacy Contractors) Regulations 2013 sets out the non-dispensing fee amount at €3.27 payable per drug item not dispensed due to exercise of professional judgement. Pharmacies can claim a fee in respect of the exercise of professional judgement resulting in a decision by the Pharmacist not to dispense **a reimbursable item** on foot of a valid GMS prescription. A valid reason for the non-dispensing must be submitted to claim for payment using the code '79999' with monthly GMS claims.

Your co-operation is requested in clearly recording the reason for claiming the Non-Dispensing Fee. Where it is not clear that the Pharmacist has exercised their professional judgement leading to a decision not to dispense a GMS Reimbursable item, the fee cannot be paid. In circumstances where there is a repeated pattern of Non-Dispensing Fee claims, over several months, for the same prescribed items in respect of an individual patient, it would be expected that the prescriber be contacted to draw attention to the redundant prescribed items.

The following reasons outlined below are not acceptable to claim for payment of the Non-Dispensing Fee;

- The item is not available i.e. stock shortage or product discontinuation situations,
- The item is delisted,
- The item is owing to the patient or marked as 'collect later',
- Supply is not a lawful option i.e. the prescription is not valid ,
- Supply is not a contractually valid option i.e. Nicotine Replacement Therapy on a GMS Repeat Form,
- Where it has been indicated that the patient is deceased,
- The item is not required by the Nursing Home,

- The supply frequency according to the Summary of Product Characteristics is such that monthly dispensing's should not occur e.g. Provia®, Mirena®, Nebido®, Implanon®, Dep-Provera®,
- Medicines that require prior approval by PCRS and for which the patient has not been approved. For example; Entresto®, FreeStyle Libre®, Fampyra®, Xarelto®.
- The amount of blood glucose test strips dispensed to a patient has reached the maximum approved quantity and the Non-Dispensing Fee is requested to be paid for not dispensing above the threshold,
- The patient has purchased the product 'over the counter',
- The item has been claimed under another scheme i.e. LTI eligibility,
- A maximum quantity is specified and has been claimed in the same calendar month e.g. medication for erectile dysfunction, Victoza®, Zyban®.

The Non-Dispensing Fee does not apply to stock order forms, as these are not patient specific. Additionally, the Non-Dispensing Fee cannot be claimed under the Hospital Emergency Scheme.

Under the GMS Scheme, where a Pharmacist supplies a GMS reimbursable item against a properly completed GMS Prescription Form, the appropriate fee will be payable. Where the Pharmacist has exercised professional judgement leading to a decision not to dispense a GMS reimbursable item, the Non-Dispensing Fee may be claimed.

We intend to review the reasons submitted in the coming months in more detail to consider how the value of the pharmacist interventions can be assessed.

I trust that this clarifies the matter.

Yours faithfully,



Anne Marie Hoey  
Assistant National Director  
Primary Care Reimbursement & Eligibility