4 October 2021

Australian Commission on Safety and Quality in Health Care
255 Elizabeth Street
Sydney NSW 2000

Via email: CCS@safetyandquality.gov.au

Dear Clinical Care Standard Committee,

Re: The Opioid Analgesic Stewardship in Acute Pain Clinical Care Standard

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide comments on the Opioid Analgesic Stewardship in Acute Pain Clinical Care Standard.

We provide the following comments for your consideration.

- It is an appropriate and useful resource.

- It would be helpful to indicate the opioid analgesic dose for a typical patient when naloxone is to be administered. The RACGP's *Prescribing drugs of dependence in general practice part C1: opioids* and *part C2: the role of opioids in pain management* provides guidance.

- Appropriate drug charts and medication administration arrangements need to be in place before discharge of a patient to Residential Aged Care Facilities. Trained staff are not always available to administer medications when necessary and medications cannot be given to the patient without completed drug charts.

- Quality Statement 9 - Transfer of care – For Clinicians

  It is pleasing to see information on appropriate prescribing at discharge and communication with the patient's ongoing care providers addressed in this statement. The RACGP recommends the statement on the medication management plan be more explicit:

  - a medication management plan that includes recommendations for the *expected time frame for the use of the medication including a plan* reducing and ceasing the opioid analgesic where appropriate *and an indication the patient has been informed of and understood the plan and objectives of the medication*.

Thank you again for the opportunity to provide feedback on the discussion paper. For any enquiries regarding this letter, please contact Stephan Groombridge, eHealth and Quality Care Manager on 03 8699 0544 or stephan.groombridge@racgp.org.au.

Yours sincerely

Dr Karen Price
President