



South African
Pharmacy Council

OFFICIAL STATEMENT CONCERNING THE DISPENSING OF CLINICAL ASSOCIATES PRESCRIPTIONS BY PHARMACISTS

1. In terms of a letter circulated by the Director General: Health, Ms MP Matsoso dated 10 December 2010 it is noted that the new occupation of Clinical Associates would be created at District Hospital level. In terms of the circular, a generic job description for the Clinical Associate was also included.
2. In terms of the generic job description the following must be noted:
 - (a) the Clinical Associates shall report to the Clinical Doctor (on technical issues) and the Clinical Manager (on administrative issues);
 - (b) the Clinical Associates shall be located at District Hospitals;
 - (c) the Clinical Associates shall perform patient-centered consultations across all ages in a District Hospital, which shall include compliance with statutory and professional obligations;
 - (d) the Clinical Associates may prescribe appropriate medication within scope of practice, which is restricted to Standard Treatment Guidelines appropriate for district hospitals, write prescriptions to comply with legal requirements and scope of practice and administer and dispense medication with due regard to legal requirements.
3. It is noted that the Health Professions Council of South Africa have provided a statement that states "*Clinical Associates can prescribe drugs as per the EDL Guidelines, under supervision as they (Clinical Associates) are not regarded as having clinical autonomy*"
4. Regulation 28 of the *General Regulations* published under the Medicines and Related Substances Act, 101 of 1965 (GNR 570 of 10 April 2003) provides the particulars which must appear on a prescription which included *inter alia* every prescription must be written in legible print, typewritten or computer generated and signed in person by a medical practitioner or authorised prescriber.

5. Section 22A of the Medicines and Related Substances Act, 101 of 1965 (Medicines Act) provides:
 - (a) Schedule 1 - 6 substances may be sold by a person registered under the Health Professions Act, 56 of 1974 (HPAct) who may prescribe only the scheduled substances identified in the schedules for that purpose, and dispense such substances if he/she is a holder of a dispensing licence;
 - (b) schedule 3-6 substances may be sold/dispensed by a pharmacist, a pharmacist intern or pharmacist's assistant acting under the personal supervision of a pharmacist, upon a written prescription by an authorised prescriber;
 - (c) no person registered under the HPAct other than a medical practitioner/dentist may prescribe a medicine or scheduled substance unless he/she has been authorised to do so by his/her professional

6. The South African Pharmacy Council hereby confirms that:
 - (a) Clinical Associates have not been approved by HPCSA and the Medicines Control Council (MCC) as authorised prescribers and no scheduled substances have been identified in the schedules to Act 101 for this purposes;
 - (b) a prescription written by a Clinical Associates is not a valid prescription unless it has been signed in person by a medical practitioner; and
 - (c) a pharmacist, a pharmacist intern or pharmacist's assistant acting under the personal supervision of a pharmacist, may not dispense a prescription that is not valid in terms of Regulation 28 and Section 22A *supra*.