

Should a Chinese Medicine Practitioner Dispense Their Own Herbs?

Abstract

This paper discusses some of the key issues associated with the dispensing of herbal medicines by Chinese medicine practitioners. As a health profession, we are most concerned about patient care. However, our current herbal dispensing practices raise issues that may jeopardize optimal service to our patients. These are discussed in the remainder of this paper.

Several reasons have been identified as to why Chinese medicine practitioners should consider outsourcing their herbal dispensing to a separate, professional dispensary staffed by highly skilled herbal dispensers. These include the potential conflict of interest associated with financial gain through the sale of herbs that are prescribed by the practitioner. There is also an increased risk of undetected errors when the practitioner assumes the role of both prescriber and dispenser. Other reasons include a lack of appropriate dispensing skills, the time and economic cost of maintaining a dispensary that includes a sufficient range of herbs, and the time and effort needed to ensure quality assurance processes are maintained. A qualified herbal medicine dispenser has the expertise and skills to be able to provide herbal medicine formulae for Chinese medicine practitioners, leaving practitioners with more time to focus on their patients. Similar potential conflicts of interest have been eliminated in Western medicine through the separation of the prescription writer (medical practitioner) and the medicine dispenser (pharmacist).



1.0 Introduction

The purpose of this paper is to present arguments as to why Chinese medicine practitioners should consider outsourcing their Chinese herbal dispensing, especially if they work for themselves. Chinese medicine is now a registered healthcare profession, with three divisions of the Chinese Medicine Register (acupuncture, Chinese herbal medicine practitioner and Chinese herbal dispenser). Chinese herbal dispensing as a separate division of the register, is arguably an acknowledgement of the special skills that dispensing requires. Many Chinese medicine practitioners in Australia dispense their own prescriptions extemporaneously (and do not need to register as a dispenser in order to do so), however it may be that this aspect of clinical practice is better handled by a professional dispensary. This paper sets out some key reasons why Chinese herbal dispensing perhaps should be conducted by a registered Chinese herbal dispenser and not by the Chinese medicine practitioner who prescribes.

2.0 Background: Chinese Medicine Workforce in Australia

A reasonably large workforce of Chinese medicine practitioners operates in Australia (4,857 registrations according to the Chinese Medicine Registration Board [CMBA]) but only 38 Chinese herbal dispensers are registered solely as dispensers. According to the latest CMBA statistics, there are 977 combined registrations for Chinese herbal dispensers and acupuncturists and/or Chinese herbal dispensers and Chinese herbal medicine practitioners, or Chinese herbal dispensers and acupuncturist and Chinese medicine practitioner.

Since July 2012, Chinese Medicine has been a nationally regulated profession. The Australian Health Practitioner Regulation Agency (AHPRA) is responsible for implementing the National Registration and Accreditation Scheme (NRAS) across Australia, working with 15 National Health Practitioner Boards. A National Board is responsible for regulating each health profession through various legislated functions, including registering practitioners and students, setting requirements and standards, and dealing with complaints. The CMBA regulates the profession of Chinese medicine. The primary aim of registration is to protect the public and registration is not about making it more difficult for practitioners.

One of our recent survey at Safflower (40 respondents) revealed that most Chinese herbalists will also dispense their own formulae made from single herbs (granules, powders, raw/crude herbs). In addition, many acupuncturists will use patent or proprietary forms of Chinese herbal medicines to complement their acupuncture treatments.

Under the Therapeutic Goods Regulations, a medicine that is extemporaneously compounded and dispensed in the form of complementary medicines sits under Schedule 5, Item 6. Schedule 8(4) provides an exemption for specified complementary medicine practitioners from the operation of Part 3-3 of the Act (Manufacturing of Therapeutic Goods) and therefore the requirement to 'manufacture' medicines under GMP (Good Manufacturing Practice).



3.0 Potential Issues Associated with Practitioners Dispensing Their Own Prescriptions

3.1 Lack of Expertise

Professional dispensing requires specific skills and knowledge. For example, a dispenser needs to know where to source the right herbs and how to apply quality assurance principles. The practitioner must understand toxicity issues associated with certain herbs and how to manage them. If we look at the Western medicine sphere, the general practitioner or specialist prescribes but the pharmacist dispenses the medication. As practitioners we are highly skilled in managing our patients, however Chinese herbal dispensers have an additional skill set. Undergraduate degree courses certainly focus on your skills as a practitioner and prescriber, yet not all training covers the specialised skills required to be a Chinese herbal dispenser. It is important to see the difference between the two separate areas.

3.2 Conflicts of Interest

The overwhelming majority of our industry is made up of virtuous and dedicated practitioners upholding the professional code of ethics. Notwithstanding this, any industry has the potential for conflicts of interest to arise and several potential conflicts have been identified in relation to Chinese herbal dispensing. One is that practitioners may only keep a limited dispensary due to financial restrictions, and therefore might not be able to offer all the herbs that the patient requires. Another potential issue is that the financial imperative to minimise costs could tempt us as practitioners to acquire cheaper herbs that are of poorer quality.

A more obvious conflict of interest is the financial gain to be achieved by the practitioner through selling products prescribed by themselves. Chinese medicine practitioners are on the lower end of the income scale, at least compared with other registered allied health practitioners (<https://www.payscale.com/research/AU/Country=Australia/Salary>) such as chiropractors and osteopaths.

Most practitioners also derive important income from the herbs that they are 'selling'. This is obviously not an optimal scenario for our profession in the current environment. However, it is acknowledged that historically it's the practice of herbalists.

It could raise the question with our patients as to whether we are being impartial. How would you feel knowing that your medical practitioner is making additional income from the medicines they prescribe for you? Would you feel confident that they are being impartial?

The issue of potential conflict of interest, that is financial gain through prescribing of medicines, has been curtailed in the Western medical profession, at least in Australia, through the clear separation of the sale of medicines and the prescribing of them. Prescribing is done by the medical practitioner, and the dispensing and sale of them is done by pharmacist. Community concerns about the marketing role of big pharmaceutical companies might still be an issue, but the public perception is that with the pharmacist being the dispenser, there might be less biased prescribing.



3.3 Time Required for Competent Dispensing

Could the time that you spend in the dispensary be better spent with patients? This time isn't just for preparing a simple formula for the patient who is relaxing with some needles. It is also to manage your stock, keep the area clean and tidy, re-order herbs and label correctly. Quality assurance processes in an herbal dispensary, including ensuring that expired products are taken off the shelves and keeping track of batch numbers used in the formulae, are time-consuming but necessary. If a certain formula caused a problem, you need to know who the supplier of the herbs was and where it originally came from. If you are not maintaining your dispensary, how can you track the source of a problem? Once products are being used for a patient i.e. dispensed in a formula, a record should be created listing not only the products that were dispensed but also their batch numbers. This all takes time. As a practitioner, it may be valuable to outsource these responsibilities to a skilled dispenser, leaving

3.4 Financial Outlay

Keeping your dispensary fresh, up to date and to a size where you can dispense any script that may be required commands ongoing resources. Having the finances and particularly the cash flow to facilitate this is a key consideration in the decision to dispense your own herbal medicine.

3.6 Cleaning and Hygiene

How much time do you spend cleaning your dispensary, making sure that products are free from dust to avoid cross-contamination? An increasing number of patients have allergies. The time and effort to keep a dispensary clean and hygienic is underestimated.

3.5 Stock Management and Wastage of Herbal Products

From my experience running a professional dispensary, I know how hard it is to budget the right number of herbs at the right time. How much wastage and expired products will incorrect ordering create? How many of us are tempted to use expired products and dispense them to our patients? Of course, giving our patients expired products is not acceptable, hence good stock management is essential to ethical and sustainable practice. Fluctuations in private practice can make this process difficult. Conversely, the volume of orders passing through a dedicated herbal dispensary, and the unique dispensary management skills of the provider, mitigates this problem altogether.



4.0 Other Issues for Consideration

4.1 Breaching CMBA Guidelines

The CMBA's Safe Herbal Practice Guidelines have been in place since 2015. They are not actively enforced by the CMBA and generally compliance is only assessed based on a complaint. The CMBA has, however, recently surveyed the Chinese medicine profession to gain feedback on these guidelines. In my experience and from recent conversations with practitioners, I have found that most practitioners are not familiar with the guidelines or are unsure what their responsibilities are.

I have also found that manufacturing or third party dispensing still occurs in Australia without a relevant licence: Third party dispensing requires a GMP (Good Manufacturing Practice) licence for compounding and manufacturing (producing products for patients) requires a GMP licence for manufacturing. With such licences not in place, the profession is either ignoring rules or is unaware of them. Unfortunately, this type of situation will jeopardize the reputation of our industry, not just individuals (who are breaking the law).

4.2 Selling Proprietary Herbal Medicines in Australia

All pre-manufactured products (also known as patent or proprietary forms of complementary medicines, including Chinese herbal medicines) must be listed or registered on the Australian Register of Therapeutic Goods (ARTG). The process of listing or registered a complementary medicine is time consuming and costly. It is known that proprietary forms of Chinese herbal medicines are being sold in our industry which are not listed or registered on the ARTG. This means that safety, quality and efficacy have not been assured under the Therapeutic Goods Administration's stringent quality control system. Unfortunately, this practice is also detrimental to our industry and only serves the individual or company selling those herbs.

4.3 Single Substances (Herbs) in Australia

It is only in recent years that there is more awareness around single (herbal) substances in raw, granulated or powdered form. This has come about, unfortunately, due to bad publicity. There are no regulatory processes in place for practitioners to have those raw materials checked or certified (i.e. quality assured). It's only with increasing pressure from the general public and the need for 'clean' products that individual practitioners take this seriously. A quality product will come from a manufacturer with Good Manufacturing Practice (GMP) licensing. When a product is produced under GMP, every product is delivered with a Certificate of Analysis (CoA) that confirms the correct botanical identity and monitors contamination levels of heavy metals and pesticides etc. Purity of goods is a scarcity in an increasingly polluted environment. However, there are legally acceptable levels of contamination with particular chemicals (e.g. heavy metals) that are considered harmless (the same applies to food).



5.0 Solution

Herbal dispensing is an expert skill. There are inherent risks when practitioners prescribe and dispense. According to one article on quality and safety of traditional Chinese medicines (Sydney University, 2003), it is not an accepted practice for a practitioner to have both prescribing and dispensing functions.

Another article from the Australian Medical Association points out the conflict of interest when the practitioner also becomes the dispenser. The Swiss Government Agency for Health prohibited dispensing in all health practitioners back in 2004 due to the conflict of interest, particularly in relation to financial gain of practitioners.

A medical practitioner in Australia no longer self-dispenses medication as this is the domain of a registered pharmacist. The dispensing by a pharmacist is another check point to make sure that the prescription for a patient is safe and optimal for the patient. Despite this, errors continue to occur and are sometimes referred to the Medical Board of Australia and the Pharmacy Board of Australia.



B Brigitte Linder

Should every Chinese herbal medicine practitioner be using the services of a registered Chinese herbal dispenser to optimise the service to the public and minimise the inherent risks associated with Chinese herbal dispensing?

6.0 Conclusion

There are numerous reasons as to why a Chinese medicine practitioner should engage in the services of a professional dispensary. Keeping a dispensary requires time and effort to ensure that correct quality assurance processes are set up and maintained. This includes ensuring that stock is adequate, up to date and that careful records kept. Such processes are time-consuming and potentially reduce the time that can be spent seeing patients. The potential to financially gain from the selling of herbal medicines when sold by the practitioner who prescribed them must also be considered. By using the services of a trained Chinese herbal dispenser, many of these issues including conflicts of interest can be eradicated completely. In addition, there could be a wider range of available herbs to prescribe. Sending prescriptions to a dedicated herbal dispensary would then free up the practitioner to spend a greater amount of time doing what they are passionate about and most suitably trained for: delivering excellent face-to-face patient care.

Potential Conflict of Interest Declaration

It is acknowledged that the author has a potential conflict of interest in offering her views on Chinese herbal medicine dispensing as she is the owner of Safflower Chinese Herbs Expertly Dispensed.

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