

Fast Facts for the Department of Health's consultation on Generic Substitution

1. The Department of Health (DH) has included three options for generic substitution, Option 1 being to do nothing. Generic prescribing is currently at 83% and, as mentioned by the DH, only an additional 5% of prescription items that were prescribed by brand are also available as a generic. By providing Option 1 the DH are acknowledging that the savings from introducing this scheme are limited.
2. The DH goes on to provide two further options:

Option 2 – Introduce generic substitution, but with specific exclusions

Option 3 – Introduce generic substitution for specified medicines only.

The DH goes on to say it favours Option 3. This suggests that Option 2 is not really a consideration and therefore the choice is between Option 1 and Option 3.
3. Even in favouring Option 3, the DH acknowledges that there are key risks:
 - Compromised patient safety
 - Cost of implementation could outweigh any savings
 - Prescribers can opt-out, thus reducing savings
 - Difficulties in maintaining the select list.
4. The DH states (points 9 and 10) that a number of meetings with stakeholders were held and that the outputs from these meetings were used in the development of this document and the three options. Key issues raised by these stakeholders include:
 - Whether introducing generic substitution will achieve anything
 - Extra work load for clinicians
 - Need to exclude certain medications.
5. The DH states that it is essential that patients' views are sought and considered. The DH has allowed until Tuesday 30 March for public consultation.
6. Interestingly, dispensing doctors are exempt from this proposed change. Why create an exception?
7. Both Options 2 and 3 will allow the prescriber to opt out of the arrangement. The proposed systems to enable this are via a tick box system with either opt in or out options (33 – 41) or by an endorsement scheme again enabling the prescriber to opt in or out (42-48). The DH favours endorsement with an opt out option.
8. The consultation on the implementation of Generic Substitution is for England only and could therefore lead to inequalities in patient care and safety across the UK.