



New ideas on inspection visas

Position paper of the Spanish Society of Primary Care Physicians (SEMERGEN)

Background

The Ministry of Health, in order to ensure rational use of reimbursed medicines, may establish specific conditions for the prescription, dispensing and financing of these products. Among such specific conditions, there are the ones commonly referred as “inspection visas”.

Last year, the High Court of Madrid ruled on inspection visas in its judgments of 1 of April and 15 of June. In both judgements, the Court acknowledges that inspection visas may create inconveniences for healthcare professionals and patients but that, on the other hand, such visas are a legal and “valued” tool to ensure the rational use of medicines. The position paper of SEMERGEN questions such reputation among primary care physicians. As per such paper, the visa system “limits primary care physicians, constitutes a barrier to prescription and access to treatment by patients, and generates inequalities between regions”. For this reason, SEMERGEN advocates for a new visa system.

SEMERGEN’s position paper

According to SEMERGEN, the new visa system should, in the first place, find a balance between freedom of prescription, security of patients, and efficiency of the National Health System. SEMERGEN also advocates for an *ex post* control of prescription rather than the *ex ante* one currently applicable. According to the Society of Primary Care Physicians, the current system (*ex ante* control of prescriptions) questions the trust of the system in physicians

who, in SEMERGEN’s view, “will always choose the therapeutic option which is best for the patient”. As an alternative, SEMERGEN proposes a control of prescription system based on *ex post* audits aimed to verify compliance with “explicit and published criteria on security and cost-effectiveness”. Finally, SEMERGEN points out that the current visa system “increases the number of contacts between the patients and the NHS which results in an increase of workload and relevant direct and indirect costs”. SEMERGEN’s paper advocates for reducing all such “bureaucratic hurdles” which in its view, constitute barriers to access to treatments by patients.

Our position

We agree with SEMERGEN that the current inspection visa system has room for improvement. In our opinion, any reform of the system should balance the interests of the patients, first and foremost, with those of healthcare professionals, the National Health System and the industry. Further, we think it is a good idea, as SEMERGEN does, to analyze costs from a global approach, that is considering both direct and indirect costs of visas. With respect the control of prescription (*ex ante* or *ex post*) we believe this is a very sensitive topic which needs to be addressed taking into account the balance of interests mentioned above. Finally, we think that any reform should seek to create a clear regulatory framework, without confusions, and which allows stakeholders to operate with legal certainty.