

May 22, 2020

Dear OCP

We appreciate the opportunity to provide a response to the open consultation for Expanding Scope of Practice: Pharmacist Prescribing for Minor Ailments.

Northwest Telepharmacy Solutions (NTS), a division of The North West Company, is the leading provider of telepharmacy services across Canada. With over 120 pharmacists practicing in hospital, primary care, long term care, community pharmacy, and many unique innovative practice models, NTS feels our input may be helpful in shaping the future of not only the profession but how patients can be safely cared for.

NTS supports and commends the work and process the Ontario College of Pharmacists (OCP) has done to develop proposed amendments to the General Regulation 202/94 of the Pharmacy Act, Part VII.3 along with the developing the chart for minor ailments with AHFS Classifications.

We have focused our feedback on two areas:

1. Proposed Amendments to the General Regulation
2. Proposed Minor Ailment categories

Proposed Amendments to General Regulations 202/94 of the Pharmacy Act, Part VII.3

We are overall in agreement with the amendments proposed. However, we are not confident if the proposed amendments will allow for remote, virtual prescribing by pharmacists.

Section 35.4.c specifically states the pharmacist “gives the prescription to the patient or his or her authorized agent”. This statement implies a physical prescription is provided.

It is in our opinion, the regulations should be amended to allow a pharmacist to prescribe virtually (after consultation by phone or video) if a patient or their authorized agent decides to use such services. For instance, in the United Kingdom, pharmacists are employed by the NHS to answer phone calls as part of their National Telehealth services. These pharmacists are authorized to prescribe remotely and send prescriptions to the patient’s pharmacy of choice. We feel that with virtual care being mandated by the Ministry as part of its pandemic response, and the rapid uptake of virtual technology, these amendments should ensure remote virtual prescribing by pharmacists is not prevented.

For remote virtual prescribing, we believe the regulations should require appropriate privacy requirements are adhered to (ie secure and approved virtual platform) along with best practice in terms of documentation. During these unprecedented times of COVID-19, having remote virtual prescribing for minor ailments by pharmacists would have been quite useful to helping with flattening the curve.

Proposed Minor Ailment Categories

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We understand the shortened list of Minor Ailment Categories is a directive from the Ministry of Health. However, we strongly feel OCP should be advocating for increase Minor Ailment Categories to protect the public especially knowing what positive impact it would have had during COVID-19. Increased Minor Ailment categories would reduce ER visits and physician office visits.

We also feel that the AFHS Classifications are not comprehensive and do not fully embrace Pharmacist's ability to provide evidenced based care. For instance, only the AFHS Classification 56.28.12 is included for Gastroesophageal Reflux Disease (GERD) which only includes the Histamine H2-Antagonists. This example shows how the Proton Pump Inhibitors (58.28.36) are excluded when in fact certain Proton Pump Inhibitors are available over-the-counter. If these Proton Pump Inhibitors are available over-the-counter, why would they not be included as part the minor ailment prescribing for GERD?

We suggest that the requirements for Pharmacist clinical documentation of Prescribing follow a problem based patient record format (SOAP Format).

Summary

Thank you again for providing us the opportunity to response to this open consultation. NTS represents a forward thinking, innovative group of pharmacists who have enhanced patient safety by incorporating technology into their practice for the past 15 years. We feel allowing pharmacists to prescribe for minor ailments is truly in the public's best safety. However, we would like OCP to ensure the amendments to the regulations allow for remote virtual prescribing, ensuring the profession is moving forward with technology and changes from both the Ministry and public expectation of how health care will be delivered.

Sincerely,



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