



College of Pharmacists of Manitoba

200 Tache Avenue, Winnipeg, Manitoba R2H 1A7

Phone (204) 233-1411 | Fax: (204) 237-3468

E-mail: info@cphm.ca | Website: www.cphm.ca

Cross Jurisdictional Consultation Response

To whom it may concern,

Thank you for giving the College of Pharmacists of Manitoba an opportunity to provide consultation on this policy. The regulation of cross jurisdictional care is intrinsically a Pan-Canadian effort and will generally involve at least two provincial pharmacy regulators at any given time. Further patient safety considerations are required for this policy in order to provide clarity to practicing pharmacists in Ontario and nationally. The scope of pharmacy practice is not consistent across the provinces, the policy should clearly address which jurisdiction the pharmacist is expected to practice under, that of the patient or the pharmacist. Additionally, the issue of complaints and discipline requires detailed discussion. This policy should clarify complaints matters with a specific focus towards which jurisdiction would host a complaint or discipline proceeding, that of the pharmacist, patient, or both. As both aforementioned policy items affect the practice of pharmacy nationally, it is important they be considered with a national consensus among all of the provincial pharmacy regulators or through NAPRA.

When an incident occurs, the nature of cross jurisdictional practice creates additional considerations by the pharmacist. Although the response to an incident would follow a similar process nationally, there are additional considerations required if the patient resides in a different Province. For example, if an incident results in a patient requiring medical care, how should the pharmacist assess this? Would the pharmacist be required to navigate the patient's Provincial health system and direct the patient to care? In the spirit of patient safety, this policy would benefit from a section communicating the expectations regarding how to handle incidents.

The review of this policy also identified sections where we suggest further clarity and detail to effectively support pharmacy practice and better outline OCP expectations.

Obtain Informed Consent

The policy requires *“registrants providing pharmacy services to patients that are physically located in another Canadian jurisdiction must be aware of, and comply with, the law, regulations, standards and policies, and any other practice requirements applicable in the jurisdiction where the patient is located.”* It is unclear how this would be enforced and how OCP will confirm that the pharmacy is compliant with the other jurisdiction's legislation. Is this left up to the PRA of the patient's jurisdiction? Further to this, it is uncertain what mechanisms are in place for the PRA of the patient's jurisdiction to become aware of this provision of cross jurisdictional care.

*College of Pharmacists of Manitoba Mission:
To protect the health and well being of the public by ensuring and
promoting safe, patient-centred and progressive pharmacy practice.*

Member of the National Association of Pharmacy Regulatory Authorities



College of Pharmacists of Manitoba

200 Tache Avenue, Winnipeg, Manitoba R2H 1A7
Phone (204) 233-1411 | Fax: (204) 237-3468
E-mail: info@cphm.ca | Website: www.cphm.ca

Out-of-Province Prescriptions

This section states under which conditions a practitioner's prescription can be accepted but does not address a prescriber that is licenced in multiple provinces, but practices virtual care from a different physical location.

Additionally, it is unclear if the prescription from an out of province prescriber must meet the legal and professional standards of the prescriber's jurisdiction. For example, would an Ontario pharmacy consider a verbal prescription valid if the prescriber's provincial jurisdiction requires it be written on a duplicate prescription pad or faxed but Ontario does not have such requirements?

The section goes on to state *"Registrants can dispense a medication according to a prescription authorized by a prescriber if in their professional judgement the patient requires the medication be dispensed by the pharmacy in Ontario."* This might benefit from further definition or an explanatory document. It is unclear as to what constitutes as an appropriate requirement that cross jurisdictional services are provided. Is there a legitimate access issue, or is the cross jurisdictional service financially based?

Providing Pharmacy Services to Patients in Ontario

This section states "To support access to pharmacy services, pharmacy professionals who are not licensed to practice in Ontario may provide care to patients that are physically located in Ontario if the following conditions are met:

- a) they hold a certificate of registration from another Canadian jurisdiction; and,*
- b) they comply with the laws, regulations, standards and policies, and any other professional practice requirements as stipulated by the Ontario College of Pharmacists"*

This needs to be expanded further to include how this will be enforced and ensure compliance with OCP legislation. Is the non-Ontario pharmacist expected to register/license with OCP?

Providing Pharmacy Services to Patients Not in Canada

This section allows for pharmacy services to be provided to a patient temporarily located outside of Canada when an existing therapeutic relationship exists. This section is unclear for the pharmacy professional on how they should determine temporary living status. Temporary living status should be somewhat defined. Furthermore, the definition of existing therapeutic relationship should be provided as it currently leaves significant interpretation. A pharmacy may argue filling a single prescription once establishes an existing therapeutic relationship.

*College of Pharmacists of Manitoba Mission:
To protect the health and well being of the public by ensuring and
promoting safe, patient-centred and progressive pharmacy practice.*

Member of the National Association of Pharmacy Regulatory Authorities



College of Pharmacists of Manitoba

200 Tache Avenue, Winnipeg, Manitoba R2H 1A7

Phone (204) 233-1411 | Fax: (204) 237-3468

E-mail: info@cphm.ca | Website: www.cphm.ca

Kind regards on behalf of the College of Pharmacists of Manitoba,

Chris Louizos

Assistant Registrar, Quality Assurance and Field Operations

And

Kevin Chaboyer

Quality Assurance and Field Officer

College of Pharmacists of Manitoba Mission:

To protect the health and well being of the public by ensuring and promoting safe, patient-centred and progressive pharmacy practice.

Member of the National Association of Pharmacy Regulatory Authorities