

[NAPRA Staff Feedback to OCP: Draft Cross-Jurisdictional Services Policy and Draft Virtual Care Policy](#)

2021-05-19

General

NAPRA staff is pleased to provide a response to OCP's consultation on the draft cross-jurisdictional services policy and the draft virtual care policy, given that cross-jurisdictional services is also one of the projects under NAPRA's Strategic Plan. For clarity, this feedback contains the comments of NAPRA staff only and should not be construed as the opinion of NAPRA's members.

One of the key activities of NAPRA's [2019-2023 Strategic Plan](#) is to develop a framework to govern cross-jurisdictional practices within Canada. NAPRA's work to develop a framework is ongoing and we look forward to the progress that OCP makes in addressing this area of practice.

Cross-Jurisdictional Services Policy Feedback

We offer the following feedback for your consideration:

- **Policy statement and Providing Pharmacy Services across Canadian Jurisdictions:** The **Policy statement** refers to the requirement that registrants, when providing cross-jurisdictional services, must meet or exceed the Ontario requirements while the **Providing Pharmacy Services across Canadian Jurisdictions statement** refers to the requirement that registrants, when providing cross-jurisdictional services, must meet the requirements in the jurisdiction where the patient is located. There can be situations where the regulations, standards, and guidance did not align between the jurisdictions. How will registrants reconcile the differences?
- **Providing Pharmacy Services to Patients in Ontario:** Potentially, the wording in this statement may be interpreted as a pharmacy professional not licensed in Ontario may **practice in Ontario** as long as they meet conditions a) and b). The wording of this statement may need to be revised if the intention of the statement is that it is referring to pharmacy professionals located and practicing in another jurisdiction within Canada.
- **Out-of-Province Prescriptions:** The statement, *"Registrants must consider the patient's ability to access the medication in their home jurisdiction when deciding to dispense a medication according to a valid prescription"*. Is this suggesting that a registrant must refuse to fill a prescription if the patient is able to access the medication in their own province?
- **Out-of-Country Prescriptions:** The statement, *"Registrants dispensing medications according to a prescription authorized by a prescriber for patients physically located outside of Canada must use their professional judgment to determine whether the patient requires the medication be dispensed by the pharmacy in Ontario."* may need clarification for registrants. The statement appears to be contradictory to the previous statement, *"Registrants must not provide pharmacy services to patients that are physically located outside of Canada and who*

do not have an established therapeutic relationship with the pharmacy professional.” It may be interpreted that a pharmacist can use their professional judgment and dispense an out-of-country prescription despite the previous statements. A suggestion for revision is “Registrants dispensing medications according to a prescription authorized by a prescriber for patients temporarily located outside of Canada and where there is an existing therapeutic relationship, must use their professional judgement to determine whether the patient requires the medication to be dispensed by the pharmacy in Ontario.”

Virtual Policy Feedback

We have no specific feedback to offer on the draft policy. We agree and support the draft policy as written.

Thank you for the opportunity to provide feedback on this consultation.

NAPRA staff

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