

June 2, 2120

Submission by Shoppers Drug Mart and Loblaw Pharmacies Regarding the Draft Cross-Jurisdictional Services Policy

Shoppers Drug Mart and Loblaw Pharmacies appreciate the opportunity to comment on the draft Cross Jurisdictional Services Policy

With respect to the following requirement, aligned with current requirements under the Drugs and Pharmacy Regulation Act, '*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*', we suggest that patient choice is added as a defined consideration, in addition to professional judgement. This could be achieved by adding a sub-bullet to this effect.

We note that explicit informed consent must be obtained from the patient or their substitute decision maker before delivering cross-jurisdictional pharmacy services. The draft Virtual Care Policy specifies that there is flexibility to obtain explicit consent either orally or in writing. We suggest that the two policies use the same language and that they allow for oral explicit consent to suffice. In addition, as both the Health Care Consent Act and Personal Health Information Protection Act use the term 'express' rather than 'explicit' consent, we are seeking to understand the reason behind the use of the term 'explicit' and any specific implications associated with the selected terminology.

Thank you for considering our input.

Sincerely,

Deb Saltmarche, Senior Director Professional Affairs

Cc: Ashesh Desai, Executive Vice President Pharmacy

For questions on our submission please contact Deb Saltmarche,
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