



November 13, 2023

Ontario College of Pharmacists
483 Huron Street
Toronto, ON M5R 2R4

Re: Seeking Feedback on Updated Documentation Guidelines

Dear Ontario College of Pharmacists (OCP),

On behalf of the Canadian Society of Hospital Pharmacists – Ontario Branch (CSHP-OB), I would like to extend our gratitude for the opportunity to review and provide feedback on the Ontario College of Pharmacists' Draft Documentation Guidelines. As an organization dedicated to excellence in hospital pharmacy practice, we appreciate the efforts of the OCP in enhancing the standards of pharmacy practice in Ontario.

After a thorough review, we are pleased to note that the guidelines align well with the principles and ethics upheld by the CSHP, especially in the areas of patient safety, professional accountability, and interprofessional collaboration. The emphasis on clear, patient-centered documentation practices is commendable and reflects a deep understanding of the role pharmacists and pharmacy technicians play in the broader healthcare context.

To further support patient and medication safety, specific recommendations and comments on the draft documentation guidelines can be found in [Appendix A](#) for your review and consideration.

Moreover, we appreciate the guidelines' focus on the practical aspects of documentation, including electronic documentation, which is increasingly relevant in today's healthcare landscape. As mentioned in the draft guidelines and governed by *PHIPA*, we echo the importance of protecting patient health information from privacy breaches, including those that may arise from cybersecurity attacks.

Furthermore, the acknowledgement of the evolving nature of pharmacy practice and the flexibility offered by the guidelines are positive features. It is recognized that the draft documentation guidelines reflect the performance indicators listed in the practice assessment criteria for pharmacists and pharmacy technicians by OCP. The establishment of a feedback mechanism for continuous improvement to continuously gather insights from pharmacy professionals would be beneficial. This would help in making both the practice assessment criteria and guidelines more dynamic and responsive to the changing needs of the profession.

To further promote documentation by pharmacy professionals, a stronger emphasis on interprofessional collaboration could be valuable. Documentation is a key element in facilitating effective communication among healthcare teams and ensuring seamless transitions of care; highlighting this could strengthen collaborative practice. Additionally, while the guidelines offer comprehensive advice on documentation practices, incorporating specific recommendations for ongoing professional development and training in this area could be beneficial, as outlined in [CSHP Documentation Guidelines](#). This would aim in ensuring that all pharmacy professionals are equipped with the necessary skills to adhere to these guidelines effectively.

In conclusion, CSHP supports the Draft Documentation Guidelines proposed by the OCP and appreciates the dedication to improving pharmacy practice in Ontario. We look forward to the implementation of these guidelines and are committed to collaborating with the OCP in future initiatives aimed at enhancing the quality of healthcare delivery.

Thank you for considering our feedback. Please do not hesitate to contact us for further discussion or collaboration.

Sincerely,

David Liu

A handwritten signature in black ink, appearing to be 'DL' or similar initials, written in a cursive style.

President, CSHP-OB



Appendix A

1. Removal of the following from Table 1 – Documentation Performance Indicators for Pharmacy Technicians:
 - 1.1. Drug Interactions
 - 1.2. Results of relevant laboratory, point-of-care, and/or diagnostic tests and other clinical assessments to inform the pharmacist's assessment
2. Addition of the following to Table 1 – Documentation Performance Indicators for Pharmacy Technicians:
 - 2.1. Previous adverse drug reactions
 - 2.2. Clear documentation of sources of information used to collect a best possible medication history
3. Further clarification is needed relating to 'identified medication discrepancies' listed in Table 1 – Documentation Performance Indicators for Pharmacy Technicians to avoid potential confusion with Medication Reconciliation, which is out of scope for pharmacy technicians.
4. Addition of the following to Table 2 – Documentation Performance Indicators for Pharmacists:
 - 4.1. Drug Interactions
 - 4.2. Previous adverse drug reactions
 - 4.3. Clear documentation of sources of information used to collect a best possible medication history
 - 4.4. Reasons why care recommendations were not accepted, if known
5. Addition of the following statement to the documentation guidelines:
 - 5.1. Medication incidents, including near misses, and adverse drug reactions should be routinely documented and reported to applicable organizations, such as OCP, organizational internal reporting systems, and Health Canada, while serious adverse drug reactions must be reported to Health Canada following applicable hospital policies and the *Protecting Canadians from Unsafe Drugs Act*.