Summary of Public Consultation Comment on "Seeking Feedback on the Documentation Guidelines"

Background

The Ontario College of Pharmacists (the College) received feedback on the proposed Documentation Guidelines through an open consultation page available on the College website and a survey designed to gather input on the proposed guideline. The draft guideline was posted on the College website on October 10, 2023. The consultation period concluded on November 13, 2023, at midnight. The College promoted the consultation to its registrants, system partners, and the public via its website and various promotional activities.

Comments Received

- 25 surveys were completed. Of these, 16 respondents identified as educators (involved in pharmacist or pharmacy technician education)
- 2 letters from system partners posted to the open consultation page – one from the Ontario Pharmacy Association and the other from the Canadian Society of Hospital Pharmacists – Ontario Branch
- 1 posted comment from a member of the public

Summary of Comments

Based on the feedback received during the public consultation process, the majority of comments and survey responses indicated that the guideline provides a clear outline of the College's expectations regarding the documentation practices of pharmacy professionals. This was a helpful response for the College because, despite no changes being made to the standard of practice for documentation, the primary objective of this revision was to improve the effectiveness of the communication of the standard.

Based on the feedback received, most of the respondents found the guideline to be comprehensive. However, a few suggested that they can be made more succinct. Although the College aims for clear and concise communication, after evaluating the current guideline, certain elements of documentation practice needed to be expanded and updated, including information for pharmacy technicians as well as sections on documentation of performance indicators, medication events, the pharmaceutical care model, and electronic documentation. As a result, this information has been added to the draft guideline while still striving for brevity wherever possible.

Several respondents expressed their positive views about the addition of tables containing the College's documentation performance indicators. They also appreciate the College's flexible approach to applying these indicators. The use of flexible language in the guideline is intentional, as the College acknowledges that each practice setting, pharmacy practice and patient encounter is unique and, therefore, documentation practices may vary. However, the guideline communicates the College's expectation that, when documenting patient care, the note needs to sufficiently capture the essence of the encounter and support the continuity of care.

For further details on the survey responses, please refer to Appendix below.

Concerns and Considerations

During the public consultation, two main concerns were raised about the guideline. First, there were multiple comments about adding practical examples of documentation to make it easier for registrants to understand the expectations. Second, it was pointed out that the guideline did not address the numerous barriers in the current practice environment that could potentially prevent a registrant from meeting the standard of practice for documentation expectations.

The College recognizes the importance of providing registrants with concrete examples or scenarios to help them meet the College's documentation expectations. To address this, the College is developing an e-learning module that will contain practical documentation examples. This professional practice resource will serve as a companion to the Documentation Guidelines and will be posted alongside them.

Several respondents mentioned that pharmacy professionals find documentation challenging due to their practice settings. Comments received highlighted various obstacles, such as staffing ratios, workflow, quotas, and limitations of the pharmacy computer systems. The pharmacy community has previously raised these concerns, and the Board of Directors has subsequently established a strategic goal for the College related to the practice environment: "Regardless of pharmacy setting, management and business exigencies do not compromise the health and well-being of pharmacy professionals or impede their ability to adhere to the Standards of Practice and Code of Ethics." The work related to this goal will commence in 2024, and the College will keep the public updated on its progress.

Content and Design Changes

The College would like to express our sincere gratitude to all the survey respondents, members of the public and system partners for providing their invaluable feedback on the content and design of the guideline. The College received several suggestions for revising the wording throughout the documents, as well as direct suggestions for modifying the performance indicator tables, revising the section on electronic documentation, enhancing the section on the Phamraceutical Care Model, and adding a section on medication events. The College has carefully reviewed and considered each comment and made changes to the guideline as appropriate.

Appendix 1

The following is the survey response data, summarized by question.

1. The purpose of drafting this guideline is to provide pharmacy professionals with direction on the College's practice expectations for documentation.
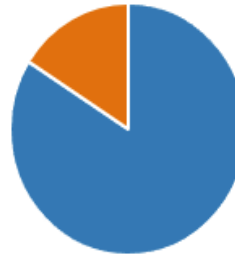
   Do the draft guidelines achieve this purpose?

● Yes	17
● No	5
● Maybe	3

2. Are the draft guidelines clear?

● Yes	21
● No	4

3. Are they comprehensive enough to support professional practice?

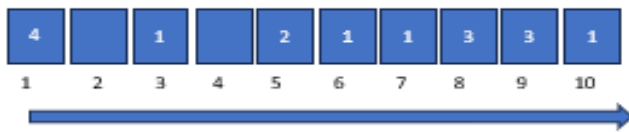 | | |
   |---|---|
   | ● Extremely comprehensive | 4 |
   | ● Very comprehensive | 12 |
   | ● Somewhat comprehensive | 7 |
   | ● Not so comprehensive | 0 |
   | ● Not at all comprehensive | 2 |

5. Have the draft guidelines adequately explained the performance indicators the College uses to evaluate pharmacy professionals' documentation practices?

🔵 Yes		14
🟠 No		3
🟢 Maybe		8

6. **For Educators Only:** How likely are you to recommend the Documentation Guidelines to your students or add it to a course resource list?

16 responses

4		1		2	1	1	3	3	1
1	2	3	4	5	6	7	8	9	10

N.B. The survey included two questions, Q4 and Q6, that solicited free-form comments. These questions were:

- 4. In what ways might the clarity and/or comprehensiveness of these draft guidelines be improved?
- 7. Are there any other comments or feedback regarding the Documentation Guidelines that you wish to share with OCP?

The comments received regarding these questions are summarized in the main body of the document.