OCP Medication Safety Program
Frequently Asked Questions

Program Introduction and Requirements

1. **What is the Medication Safety Program?**
   As part of its mandate to serve and protect the public, the College is evolving its expectations around how pharmacy professionals and pharmacies respond when a medication incident occurs by introducing a mandatory, standardized Medication Safety Program for all community pharmacies in Ontario. The program includes a requirement to anonymously report medication incident data to a third party, to identify trends and support improvements within pharmacies. Ultimately, learnings from the program will help prevent incidents from reoccurring and enhance patient safety across Ontario. For more information on the Medication Safety Program, please see the College's **website**.

2. **Who is Pharmapod and why was Pharmapod chosen as the independent third party vendor to support the Medication Safety Program?**
   Pharmapod is the third party selected by the College following a formal request for proposals process, to create and manage the program reporting system. Their platform will be used by pharmacies to enter medication incident data. Pharmapod will also be providing training, resources and data analysis for pharmacies and the College.

   The Pharmapod platform is a pioneering cloud-based solution designed by community pharmacy professionals for community pharmacy professionals. The platform allows for easy entry of medication incidents and on-site, real-time analysis of medication incident data presented in a user friendly manner. The platform and Pharmapod team empower healthcare professionals to use the platform as a management tool to identify risks in their practice, share their learnings and prevent recurrence of patient harm.

3. **Is the Medication Safety Program mandatory?**
   Yes, all Ontario community pharmacies will be required to participate in the mandatory, standardized Medication Safety Program. The Medication Safety Program will be in place by the end of 2018. Pharmacies will be on-boarded to the Pharmapod platform in waves throughout early 2019, to ensure smooth uptake. You will be contacted and notified by Pharmapod when it is time for you to receive an account.

4. **What are the requirements of the Medication Safety Program?**
   There are 4 requirements of the program that each pharmacy must meet:

   1. **Report:**
      - Anonymous recording of all **medication incidents** by pharmacy professionals to a specified independent, objective third-party organization to support quality improvement within the pharmacy, and for population of an aggregate incident database to facilitate anonymous reporting that will identify issues and incident trends to support shared learnings.

> *** Medication incident**: Any preventable event that may cause or lead to inappropriate medication use or patient harm. Medication incidents may be related to professional practice, drug products, procedures, or systems, and include prescribing, order communication, product labelling/packaging/nomenclature, compounding, dispensing, distribution, administration, education, monitoring, and use.
>
> **Near miss**: An event that could have led to inappropriate medication use or patient harm but did not reach the patient. Near misses provide valuable insight into areas of risk, and may indicate where systems can be improved to prevent harm.

2. **Document:**
   - Documentation of appropriate details of medication incidents and near misses in a timely manner to support the accurateness of information reported.
   - Documentation of continuous quality improvement (CQI) plans and outcomes of staff communications and quality improvements implemented.

3. **Analyze:**
   - Analysis of errors in a timely manner for causal factors and implementing appropriate steps to minimize the likelihood of recurrence of the incident.
   - Completion of a Pharmacy Safety Self-Assessment (PSSA, which will be available on the Pharmapod platform) within the first year of implementation of the program, then at least once every 2-3 years. The Designated Manager may determine a PSSA is required more frequently if a significant change occurs in the pharmacy.
   - Analysis of individual and aggregate medication incident data to inform the development of quality improvement initiatives.

4. **Share learning:**
   - Prompt communication of appropriate details of a medication incident to all pharmacy staff, including causal factors of the error and actions taken to reduce the likelihood of recurrence.
   - Regular scheduling of CQI communication with pharmacy staff to educate pharmacy team members on medication safety, encourage open dialogue on medication incidents, and complete a PSSA (when required).
   - Development and monitoring of CQI plans, outcomes of CQI communications and quality improvements implemented.

5. **How can I determine when to record a near miss?**
   If a potential error is caught outside of the established processes and procedures at the pharmacy but before the prescription reaches the patient, then it should be recorded as a near miss. Established processes and procedures could include the technical and therapeutic signoffs and/or any other regular process in place to catch errors such as input or DIN errors.

   Regardless of when a near miss or medication incident is caught, if you notice that similar incidents are reoccurring on a frequent basis, this may indicate that the processes and procedures you have implemented into the workflow are not effective and should be reviewed.

The extent to which near misses are recorded will be a professional judgment decision of the Designated Manager in consideration of the nature of the near miss, its implication for patient safety and the extent to which it is recurring.

Technology and Data Protection

6. **How is patient confidentiality protected within the system?**
   Personal health information *must not* be entered into the Pharmapod platform. The only data entered in the platform that is related to the patient will be the patient's year of birth and gender. The prescription number associated with the medication incident will also be an optional field, to allow pharmacy professionals working at the pharmacy the ability to cross-reference with the pharmacy's practice management system (PPMS).

7. **What data will OCP have access to and what will it do with it?**
   The College will not have the ability to view data at the level of a specific pharmacy, pharmacy professional or medication incident. OCP will only receive de-identified aggregate data for the purpose of reviewing medication incident trends to inform the development of resources to address gaps and issues identified, and to support shared learning across Ontario.

8. **How anonymous is the data I record on the platform?**
   Each pharmacy will only be able to view data they have entered. The central offices for organizations with groups of pharmacies will **not** have the ability to access data from the Pharmapod platform. Only local pharmacy staff with an authorized account at the pharmacy will be able to access their pharmacy's platform. Each pharmacy (and their staff) will be provided with a unique login, and it is very important that this be kept confidential.

9. **Will the public be able to see medication incident data reports?**
   In the future, OCP may make reports on aggregate medication incident trends accessible to the public to support patient safety in a transparent manner. Public reports will only contain information on de-identified aggregate trends.

10. **What types of devices can we use to access the system?**
    The Pharmapod platform may be securely accessed from any internet enabled device including desktops, tablets or mobile devices, with the user interface optimized for each given device. The platform is cloud-based, therefore a device does not have to be inside the pharmacy location to access the platform.

11. **My pharmacy already has a reporting system. Can the Pharmapod system integrate with other systems?**
    At this time, the Pharmapod platform is the required interface for the College's Medication Safety Program. Over time, the option to build application program interfaces (API) to link with existing software may be explored, as the Pharmapod platform has the capability to integrate with other systems. The College and Pharmapod look forward to working with the community pharmacies over the coming year to understand the challenges/ opportunities.

Implementation

12. Will there be any formal training on how to use the Pharmapod software? How much training will be provided?

A web-based training program will be available in the fall of 2018. This training module will cover both the use of the platform for recording incidents as well as the continuous quality improvement (CQI) tools in the platform and how to generally implement the CQI processes within your pharmacy. Within this module you will also have training on how to complete a Pharmacy Safety Self-Assessment (PSSA). In addition to the web-based training on all components, you will be able to reach out to Pharmapod directly for one-on-one support as needed.

13. What kind of a time commitment does this system require?

There has always been an expectation that pharmacies are engaging in continuous quality improvement, as illustrated in the NAPRA Model Standards of Practice. The Pharmapod platform has been designed to enable more streamlined, standardized, accurate and complete tracking of this information and minimize the time required to do so. The Pharmapod platform will support pharmacies to record and analyze medication incidents by:

- Using pre-populated drop downs to decrease the time required to enter information
- Using standardize responses to support the analysis of medication incident trends.
- Offering a suite of pre-populated analytic reports that can be used to identify areas for improvement within your specific pharmacy processes.
- Integrating continuous quality improvement (CQI) tools within the platform to support the recording and management of continuous quality improvement activities.
- Creating an in-platform forum for communication regarding specific medication incidents or CQI initiatives.

Recording medication incidents is an important tool for every pharmacy to use to identify gaps within their own processes and generate solutions that will help minimize the risk of errors and harm to patients. The Pharmapod platform has an easy to use, intuitive design that supports recording and analysis of medication incidents at your pharmacy.

14. Who in the pharmacy will need access to the system?

Designated managers are encouraged to engage all pharmacy staff in entering medication incidents into the Pharmapod platform, including pharmacists, pharmacy technicians and pharmacy assistants. All staff within the pharmacy need to be able to support the process and the program to ensure its success. Designated managers will have the control to assign levels of access to individuals within the pharmacy.

Next steps

15. When will all pharmacies be required to begin participating in the Medication Safety Program?

The Medication Safety Program will be in place by the end of 2018. Pharmacies will be on-boarded to the Pharmapod platform in waves throughout early 2019, to ensure smooth uptake. You will be contacted and notified by Pharmapod when it is time for you to receive an account.

16. Is there a fee for this program?

The Medication Safety Program, mandatory for all accredited community pharmacies, is paid for by the Ontario College of Pharmacists. The cost for the program, just as all other programs administered by the College as part of our regulatory responsibilities and public-protection mandate, are recovered through fees paid by registrants and accredited pharmacies. The program is scheduled to be rolled out to all pharmacies at the end of 2018. As always, when preparing the budget for the 2019 fiscal year, the College will assess fee levels necessary to cover expenses and maintain our regulatory programs and appropriate reserves. Given the cost of the program, we anticipate that this will have an impact on fees for 2019, subject to Council approval in September 2018. Any impact on fees will be communicated promptly.

17. How will OCP monitor pharmacy and pharmacy professional engagement with the mandatory requirements of the Medication Safety Program?

Pharmacy implementation of the Medication Safety Program will be assessed by community practice advisors as part of the Community Pharmacy Assessment Program already in place at the College. The College will not access any individual records in the system, but pharmacy professional engagement with the program and evidence of meaningful use will be reviewed as part of the assessment process.