

## **Summary of feedback for Pharmacists Regulation**

The Government of Yukon is updating legislation for pharmacists and rural permit holders (physicians who dispense drugs). From April 21 to July 21, 2017, the public was invited to provide feedback on the proposed:

- Pharmacists Regulation;
- Standards of practice for pharmacists;
- Standards of practice for rural permit holders; and
- Code of ethics for pharmacists and rural permit holders.

This legislation will govern pharmacists and rural permit holders and will improve pharmacy services and standards. It will be part of a larger legislative framework that governs the pharmacies and rural dispensaries where these professionals work. All the elements of the framework will come into law at the same time.

Stakeholder meetings were held with the Yukon Pharmacists Association, Yukon Registered Nurses Association and the Yukon Medical Association. In addition, ten responses were received from people identifying as pharmacists, rural permit holders or pharmacist corporations. Two were received from members of the public. This feedback will be considered in the proposed legislation.

Feedback is categorized into themes, below.

### **Scope of practice**

#### **Extending, adapting and substituting prescriptions**

- Most stakeholders support allowing pharmacists to extend, adapt, and substitute prescriptions, with some recommended restrictions to extensions and adaptations. These three additions to the pharmacist scope of practice are intended to prevent treatment interruptions and to tailor prescriptions to patient needs.
- Pharmacists indicate a need for clarity in the Regulation on whether they can extend a prescription more than once.
- Pharmacists recommend that extensions be considered a type of adaptation.

#### **Ordering lab tests and viewing results**

- Pharmacists and physicians agree that pharmacists should be able to view patients' laboratory test results. Pharmacists consider this an important way to ensure that prescriptions are appropriate for the patient.
- Pharmacists and physicians agree that pharmacists should not be able to order laboratory tests at this time.

#### **Administering vaccines**

- Pharmacists, physicians, and nurses recommend that pharmacists be able to administer some forms of vaccines, but only if they have the appropriate qualifications.

### **Substitutions notification**

- Pharmacists and physicians recommend that pharmacists should not have to notify the prescribing physician when they are substituting a generic version of a drug or changing the form of the medication, for example, capsule to tablet (unless the regimen or dose needs to be changed). Physicians would still be able to prohibit substitutions when prescribing.

### **Difference in scope of practice between pharmacists and rural permit holders**

- Pharmacists recommend that the scope of practice for pharmacists be clearly distinguished from the scope of practice for rural permit holders.

### **Advisory supports and input**

- Pharmacists and nurses recommend that pharmacists be consulted on advisory committee appointments and have a say on which issues are discussed by the committee.
- Pharmacists and nurses recommend advisory committee members be reimbursed for their time.
- Pharmacists, physicians, and nurses recommend that the Government of Yukon partner with a provincial regulator to keep the standards and guidelines for Yukon pharmacists current and add new ones as needed.

### **Licensing**

- Most pharmacists and physicians support the requirement for pharmacists to maintain a licence in another Canadian jurisdiction. This ensures that pharmacists meet professional requirements and gives them access to professional resources.
- Some pharmacists object to working under requirements of other jurisdictions, and suggest including Yukon-specific continuing education requirements.

### **Registration**

#### **Provisional registration**

- Pharmacists recommend having a provisional class of registration. This would allow newly graduated and internationally trained pharmacists to register in Yukon on the condition that they are supervised by a full pharmacist and hold provisional registration in another province or territory.

#### **Student dispensing**

- Pharmacists recommend that pharmacy students be able to dispense drugs under the direct supervision of a pharmacist. This allows pharmacy students to meet their program requirements.

#### **Active practice**

- Pharmacists recommend removing the requirement for pharmacists to have practiced in the last two years. This requirement is redundant because pharmacists are already required to maintain a licence dependent on active practice in another jurisdiction.

### **Letter of good standing**

- Pharmacists recommend replacing the letter of good standing in the registration process with a declaration. This would reduce time and registration costs for pharmacists.

### **Public register**

- Pharmacists and physicians recommend publishing a list of registered pharmacists.

### **Timeliness of renewal**

- Pharmacists say they have experienced delays in processing their applications. They want replacement registration certificates to be issued before the originals expire.

### **Code of Ethics**

- Pharmacists and physicians recommend that some principles in the code only apply to pharmacists and not rural permit holders, such as nurturing the profession of pharmacy.

### **Standards of Practice**

#### **Non-delegation of dispensing**

- Pharmacists agree that only pharmacists or rural permit holders can dispense drugs.

#### **Some drugs do not need to be recorded**

- Pharmacists and physicians recommend the Pharmacy Advisory Committee create a list of drugs that do not need to be recorded in a patient's profile for reasons of public safety. Such drugs might include lice medication.
- Physicians recommend the list be approved by the Yukon Medical Association.

### **Rural permit holders**

#### **Limitations**

- Pharmacists support that rural permit holders be limited to practicing only in a rural dispensary, and recommend adding a requirement that rural permit dispensing services cannot be offered where pharmacy services are reasonably available.
- Pharmacists and physicians support limiting rural permit holders to drug compounding that is simple and uncomplicated, so long as this type of compounding is carefully defined.
- Pharmacists agree that dispensing should be carried out by a second rural permit holder (not the physician who wrote the prescription) whenever one is reasonably available.
- Pharmacists support the requirement for rural permit holders to dispense only drugs they prescribed, citing patient safety. Some physicians recommend removing this requirement so that rural permit holders can dispense drugs prescribed by medical specialists or dentists, citing patient convenience.

#### **Fees**

- There was discussion about whether rural permit holders should be able to charge both a prescribing and a dispensing fee for the same prescription. Most pharmacists and

physicians say it is acceptable for rural permit holders to charge both fees; some physicians say it is necessary for cost-recovery.

### **Watson Lake**

- One member of the public states the importance of having a pharmacist in Watson Lake, since there is no pharmacist there now.

### **Inspections and discipline**

- Pharmacists and physicians recommend that all pharmacists and rural permit holders complete an exam on Yukon's legislation, standards of practice, and code of ethics that apply to their practices, and that they be consulted on its development. This exam would be open book and non-pass/fail.
- Pharmacists recommend regular audits and inspections of a rural permit holder's practice by a pharmacist. Physicians recommend rural permit holders be consulted on who will audit them and that an appeal process should be in place.
- Some pharmacists suggest that discipline committee members should be full registrants.
- One member of the public, from outside Yukon, suggests developing an anonymous medication incident reporting system to improve safety for patients.

### **Other**

- Some pharmacists recommend clarifying the types of insurance pharmacists require.
- Some pharmacists suggest considering additional advertising restrictions.

### **Future amendments**

- Future changes may include allowing pharmacists to prescribe drugs for minor ailments or in emergencies where a patient cannot reach a physician, and including blood products in the pharmacists' scope of practice.
- All pharmacists support regulation of pharmacy technicians, and most recommend doing this in a future amendment to the Regulation.