

NEWFOUNDLAND AND LABRADOR PHARMACY BOARD

Standards of Pharmacy Practice



The Provision of Pharmacy Services via the Internet or by Distance Delivery

Approved by the Newfoundland and Labrador Pharmacy Board April 14, 2002
Amended November 15, 2003

Introduction

An increasing number of Canadian pharmacies are developing homepages to facilitate the delivery of "on line" pharmacy services. Similarly, an increasing number of pharmacies in Canada have begun to provide distance delivery of services. Distance delivery refers to the provision of pharmacy services to a population that is unable to receive such care via face-to-face encounter in a pharmacy. This includes patients confined to their own home, residing in nursing homes, special care homes, other provinces or even other countries.

The Internet provides a new medium for communication between health professionals and patients and distance delivery enhances the options available for the accessibility of pharmacy services. These options, however, do not change the standard of care that should be expected by any profession. Regardless of the vehicle (e.g. through on-site interaction with patients, mail-order or electronically) pharmacists must ensure that their professional services are provided in accordance with established standards of practice. Unique features of each mode of service delivery may however, require special applications and adaptations of the standards of practice.

In response to questions from the public, pharmacists, other health professionals and government agencies, the Provincial Registrars, through the Inter-Provincial Pharmacy Regulatory Committee (IPRC) of the National Association of Pharmacy Regulatory Authorities (NAPRA), developed model standards applicable to the delivery of pharmacy services by accredited Canadian pharmacy operations, through the Internet. In developing this document, relevant standards and guidelines in place in various jurisdictions as well as advice from legal counsel were considered.

These model standards were approved by the NAPRA Council in November 2001 and adapted by the Newfoundland Pharmaceutical Association's Council (now the Newfoundland and Labrador Pharmacy Board) at their April 14, 2002 meeting. Council further adapted the NAPRA model standard on November 15, 2003, to extend applicability of these Standards of Pharmacy Practice to the distance delivery of pharmacy services.

1. General

Newfoundland and Labrador pharmacies offering pharmacy services to patients through the Internet must comply with all federal and provincial legislation and usual standards and policies imposed in the traditional environment for the practice of pharmacy and or distribution of medication. In addition, the pharmacy must register their web site address with the Newfoundland and Labrador Pharmacy Board as a component of their Business License and must ensure that the on-line aspect of their operation complies with the following practice standards.

2. Minimal information to be displayed on the pharmacy homepage

The home page must clearly show:

- a) That the pharmacy is duly licensed/accredited and by whom (jurisdiction and the pharmacy regulatory authority's name and address). This notice must also advise consumers that if they reside outside of the jurisdiction(s) in which the pharmacy is licensed and a problem arises, they may need to contact the pharmacy regulatory authority in the pharmacy's jurisdiction for redress;
- b) The physical location of the pharmacy operation;
- c) The pharmacy telephone number including area code; and
- d) The name of the Pharmacist Manager or Pharmacist-in-charge

3. Sale of Scheduled Drugs

The pharmacist must comply with all established Standards of Practice. For instance, the pharmacist must make an assessment of the patient's need for Schedule II drug products prior to release and be responsible for the decision to

sell them. He or she must be readily accessible and available for consultation when Schedule III drug products are ordered. All established standards for the sale of Schedule I drugs must be adhered to, including requirements for the provision of information and counselling and for developing a professional relationship with the patient.

4. Prescriptions

The pharmacist can only accept prescriptions if they are ordered in writing, verbally or via facsimile transmission by the prescriber, in accordance with the provisions of the Pharmacy Act, Regulations, Bylaws and any established Standards of Pharmacy Practice.

In those cases where the prescription is written, the original written form must be received by the pharmacy prior to the release of the drug(s).

A pharmacist should not knowingly fill prescriptions that are issued by a practitioner in a manner contrary to the normal standards of practice for that practitioner in this province. As an example, the countersigning of prescriptions written by physicians in another province (or country) must be done in accordance with the policies on prescribing practices adopted by the Newfoundland Medical Board.

5. Advertising

The pharmacy website must be in compliance with federal and provincial regulations regarding the advertising of drugs and pharmacy services.

6. Physician-Pharmacist Partnerships

It is professional misconduct for pharmacists to enter into agreements with prescribers that would limit the patient's choice of pharmacies, including Internet pharmacy operations.

7. Patient Information

The pharmacist must ensure that safeguards are in place so that patient personal health information is collected, recorded and used in a manner to protect confidentiality and privacy. Specifically, the pharmacist must ensure compliance with any Standard of Pharmacy Practice respecting privacy and confidentiality of personal health information adopted by the Board.

8. Inspections

The Internet pharmacy operation must be available for on-site inspections as part of a licensed pharmacy.

9. Disclaimers

Pharmacists must not attempt to exempt the pharmacy operation or the pharmacists from compliance with the applicable standards of practice and usual professional duties and obligations which a pharmacist owes to the patient, by obtaining releases or disclaimers from the patient.

10. Professional Care

- a) The pharmacist is responsible for maintaining a complete medication profile on patients, monitoring for adverse events and interactions, counseling the patient on safe, appropriate use of their medications, collaborating with the patients' physician as required and documenting interventions in patient care.

- b) Pharmacist-patient dialogue must be in person whenever practicable. For distance delivery of service, telephone dialogue is appropriate.
- c) Counseling is expected on all prescriptions – new and refill. The extent of counseling may vary at each encounter. For distance delivery of service, telephone communication is acceptable. Written materials are only supplements to verbal counseling, not counseling by itself. The counseling may occur after the prescriptions have been issued from the pharmacy, but must occur within a reasonable period.
- d) For distance delivery of service, all instances of counseling should be documented in the patient profile.
- e) It is contrary to accepted pharmacy practice to fill prescriptions for patients where there is no bona fide pharmacist/patient relationship.
- f) Pharmacists must comply with all regulations or Standards of Practice regarding delivery of the prescription, counseling the patient about their medication treatment, as well as, all other practice requirements applicable to a patient's accessing of pharmacy services.

11. Local Jurisdiction

Pharmacists must comply with all rules or regulations in effect in the jurisdiction where the patient resides.

12. Operating Name

The manager will ensure the correct and consistent use of the pharmacy operating name as it appears on the pharmacy license for all pharmacy identification, on or in labels, directory listings, signage, packaging, advertising or stationary.