Professional Notice

To: Pharmacy Practitioners
From: Nova Scotia College of Pharmacists
Date: March 22, 2020
Re: Health Canada CDSA Exemption; Verifying Authenticity; Provision of OAMT

Health Canada CDSA Exemption

Health Canada has issued a Subsection 56(1) Class Exemption for Patients, Practitioners and Pharmacists Prescribing and Providing Controlled Substances in Canada During the Coronavirus Pandemic that for Nova Scotia pharmacists permits:

- prescribing to renew, adapt and provide part-fills for CDSA drugs
- transferring prescriptions to other pharmacists within Nova Scotia
- receiving verbal orders from physicians, nurse practitioners, dentists and veterinarians
- delivery of CDSA drugs to the patient or someone authorized by the patient

The exemption is in place until September 30, 2020 unless extended or revoked by Health Canada. The NSCP will advise if there is any further guidance or clarification from Health Canada in the coming days and weeks.

The NSCP has developed the Emergency Protocol that will enable prescribing CDSA drugs in NS (referenced in the Prescribing in a Public Health Emergency/Crisis Standards) and is working with the Nova Scotia Prescription Monitoring Program (PMP) and the Drug Information System (DIS) to implement the necessary system changes. All partners are working diligently to be able to release this Emergency Protocol early next week.

Verifying Authenticity

While these provisions are being made to enable healthcare practitioners to meet patients’ needs, it is possible that some will use this time of crisis to take advantage of these provisions for illegal purposes. Pharmacy practitioners need to be extra vigilant in determining the legitimacy of the prescriber and the prescription, particularly for prescriptions that have not been e-prescribed in the DIS or not written on a PMP form.

Provision of OAMT

Provisions related to the Standards of Practice: Opioid Agonist Maintenance Treatment have been made to support pharmacy practitioners in providing OAMT to their patients during the COVID-19 pandemic. The Opioid Agonist Maintenance Treatment Services During the COVID-19 Pandemic document sets out provisions for the following:

- signatures
- witnessed dosing
- take-home doses
- provision of doses for patients under isolation
- compounding methadone

Inevitably, there will be numerous situations that are not specifically addressed by these provisions. You will need to decide what is best to do, guided by the Standard of Care During a Crisis and balancing the patient’s need to be supported in their recovery and the public’s safety in the context of the ongoing opioid crisis and the COVID-19 pandemic.