REGISTRAR'S ADVISORY

Pharmacy Practice Guidelines for Virtual Pharmacy During COVID-19

Introduction

Public health emergencies are exceptional situations that significantly impact the health needs of the public, while at the same time challenging the healthcare workforce as the result of the direct and or indirect impact of the crisis on pharmacy practice.

Responding to COVID-19 warrants consideration of how pharmacists and pharmacy technicians may be utilized in the dispensing process when they are unable to be present in the pharmacy and when there are appropriate safeguards in place. The Nova Scotia College of Pharmacists (NSCP), prior to the current emergency, was in the process of drafting legislative changes which would enable a consideration of evolving technology that has made it possible for patient care in many sectors to be provided or delivered to patients in ways other than traditional in-person interactions. Often referred to as virtual care, this type of care can be delivered through numerous platforms, including telephone, videoconferencing, mobile apps, email, text messaging, just to name a few.

The guidelines outlined in this document are intended to be of assistance in the current COVID-19 emergency as to what might be implemented and considered by pharmacies now, with a more specific and detailed standards framework to be considered once it is possible to engage in a robust consultative process/pilot with stakeholders and pharmacies with potential for broader application.

While the current regulations require that all steps in the dispensing process take place in the pharmacy, the regulations do not require that all the people involved - the dispensing pharmacist or pharmacy technician and the patient - need be present in the physical pharmacy for all steps of the process. Pharmacy managers may need to consider ways in which the use of virtual processes during the COVID-19 pandemic may reduce the risk of transmitting the virus and respond to situations in which staff are unable to be physically present in the pharmacy.

Purpose

A primary goal of the NSCP during a public health emergency is to optimize the deployment of pharmacy practitioners in meeting the public's health needs. Even optimally staffed pharmacies may need to consider what might be available to them in the way of providing additional services with less physical contact in the current COVID-19 emergency.

Pharmacy services that may be delivered virtually include:

- patient care including prescribing and consultation

- steps in the dispensing process including determining appropriateness of therapy, medication order entry and verification, medication selection and preparation verification, clinical verification, and counselling
- drug information services

While the provision of virtual pharmacy care presents an opportunity to address the challenges that may arise when a pharmacy practitioner is not available to be physically present in the dispensary, it can expose patients and pharmacy practitioners to risks not normally encountered when pharmacy care is delivered within a traditional pharmacy setting.

This Registrar's Advisory and other NSCP practice provisions established for a public health emergency, are made in compliance with the Pharmacy Act and regulations and are consistent with the principles of the NSCP's standards and policies.

Legislative requirements applicable during the COVID-19 emergency:

1.0 The pharmacy manager is responsible for ensuring that pharmacy practice, whether virtual or in person, meets the requirements of the Pharmacy Act and regulations and the Standards of Practice.

2.0 The pharmacy manager must ensure that the pharmacist or pharmacy technician who completes steps in the dispensing process virtually does so in compliance with the Pharmacy Act and regulations and Standards of Practice.

3.0 The pharmacy manager must ensure that patient confidentiality, security of access, completeness and retention of required documentation in accordance with the Pharmacy Act and regulations are met. Remote data entry may be utilized if security of access to the pharmacy practice management software (PPMS) and security of access to the Nova Scotia Drug Information System (DIS) are ensured.

4.0 A pharmacist or pharmacy technician who completes steps in the dispensing process virtually is responsible to the pharmacy manager.

5.0 A pharmacy technician can only complete steps in the dispensing process virtually when the pharmacy manager or a pharmacist who is responsible to the pharmacy manager is immediately available to consult.

6.0 The pharmacy manager must ensure that the technology and/or platform used to meet these requirements for patient confidentiality and security of access when providing care directly to patients are platforms adopted or approved by the Nova Scotia Department of Health and Wellness (NSDHW).[i]

7.0 Pharmacists use their professional judgment to decide whether information provided by the patient satisfies the requirement for in-person assessment of physical factors as set out in s. 1.7 of *the Standards of Practice: Prescribing Drugs.*

As a reminder, a pharmacy must always be under the supervision of a pharmacist who is physically present in the pharmacy. **Note: Authority has been provided to the NSCP to modify this requirement during a state of emergency on a case by case basis. Pharmacy owners or managers should contact the NSCP if they are at risk of closure.**

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[i] See also the Nova Scotia Health Authority (NSHA) COVID-19 Virtual Visit Implementation Guide prepared for physicians as a document that outlines guides for virtual care.

Guidelines

When pharmacy practitioners provide pharmacy services virtually, the pharmacy manager must ensure and be satisfied that the following requirements have been met and that personnel authorized to provide virtual care are doing so in a manner consistent with what is required:

Security of Patient Information

- The accessing, gathering and use of patient's personal health information must be done in accordance with privacy legislation (PHIA).
- Only those who require access to the patient's information for the purpose of delivering care are able to access it (e.g., restricted access to patient information is ensured).
- A plan must be in place to identify and address any data or privacy breaches that occur as a result of providing virtual pharmacy care.

Patient Confidentiality and Communications

- When a pharmacist interacts virtually with patients from a site outside of the pharmacy, the pharmacist must ensure that others cannot overhear any exchange with the patient.
- The pharmacist must be able to confirm the identity of the patient.
- Any telephone messages left for patients must preserve confidentiality.
- Any communications sent electronically and by telephone must be PHIA compliant.
- The pharmacist or pharmacy technician must use communication skills that consider the particular needs of the patient (e.g., language barriers, hearing impairment, etc.).
- Technology or communication tools used must meet the needs of the patient (e.g., the ability of the patient to understand the use of the technology).

Technology Used

- The technology used must have the necessary safeguards to meet the requirements for the security of the patient's personal health information as set out in the Pharmacy Act, Regulations and Standards of Practice.
- Any web-based communications must take place over secure networks.
- Appropriate measures must be in place to ensure data is appropriately stored and backed up.

Documentation

Complete documentation regarding the service provided to patients virtually must be captured within the pharmacy's patient record (i.e., in the PPMS).