

POSITION STATEMENT

Professional Responsibilities to Meet Patient Needs Related to Compounding, Opioid Agonist Therapy, and Prescribing

Introduction

It is in the public's best health interest to have their drug-related health needs addressed as fully as possible by community pharmacies. This includes being able to expect a consistent range of care from Nova Scotia community pharmacies. As such, this position statement clarifies the NSCP's expectations of pharmacy practitioners and community pharmacies in fulfilling their responsibility to meet the needs of their patients related to compounding, opioid agonist therapy (OAT), and drug-related problems that may be resolved through pharmacist prescribing.

Since the inception of the profession of pharmacy, the dispensing and compounding of drugs has been an important societal need that pharmacists (apothecaries, druggists) were uniquely trained to meet. This is reflected in the *Pharmacy Act*, which lists dispensing and compounding as a primary responsibility of the profession, and then goes on to restrict this activity to a pharmacist or a pharmacy technician and to require a pharmacy to have the equipment and space needed to safely do so.ⁱ This restriction on the dispensing and compounding of drugs is a privilege and creates a corresponding obligation for the profession to provide this service for society.

Consistent with the professional responsibility to provide restricted services, the *Registration, Licensing and Professional Accountability Regulations* establish an accreditation process for a limited-service pharmacy that enables a pharmacy to provide services limited to a specific clientele, conditional on Council being satisfied that doing so would be in the interest of the public's health.ⁱⁱ It can be therefore be understood that pharmacies are otherwise expected to provide a full complement of pharmacy services to meet the needs of their patients. This is further supported by *Pharmacy Practice Regulations* s. 24 and 25 that are aimed at ensuring pharmacies are equipped and able to meet the needs of their patients.

The Nova Scotia College of Pharmacists (NSCP) *Code of Ethics* Value V - *Responsibility to the Patient* outlines the following responsibilities for pharmacy professionals:

- Registrants take all reasonable steps to provide appropriate medications and services to their patients. Registrants who are unable to provide prescribed medicines or services to their patients take reasonable steps to ensure patient care is not jeopardized.
- Registrants play a role in assisting patients to navigate the healthcare system, including referring them to other appropriate health care providers, services and community resources.

ⁱ *Pharmacy Act* s. 22(2), s.65; *Pharmacy Practice Regulations* s. 24 (4,5,6)

ⁱⁱ *Registration, Licensing and Professional Accountability Regulations*, s. 31

Like all areas of healthcare, the profession's collective understanding of the standard of practice needed to provide safe and effective care for various practice activities is continually evolving. However, this does not change the professional responsibility to engage in these activities to meet the needs of patients. In the context of updated standards and policies for compounding, prescribing, and the provision of opioid agonist therapy (OAT), the NSCP is clarifying that it is the professional responsibility of all pharmacy professionals to adapt to the evolving standard of practice and use their specialized knowledge and skills to continue to meet the needs of their patients by engaging in these practice activities.

Compounding

Access to compounded medications is critical to many patients, especially those for whom there are no appropriate manufactured products available. Pharmacies that do not provide compounding services, or do not support patients in having their needs for compounded products met by another pharmacy, are restricting the public's access to necessary medications.

Opioid Agonist Therapy

OAT is a critical healthcare and harm reduction service for people who use drugs. Canada continues to experience a public health crisis stemming from the use of opioids and other substances. Dispensing OAT is a privilege restricted to pharmacy, and as such pharmacy practitioners play a foundational role in supporting this important public health strategy and improving access to treatment for people who use drugs.

Prescribing

Prescribing is a means by which a pharmacist uses their unique expertise to resolve a patient's drug-related problem. A pharmacist's reluctance to use their expertise and authority to prescribe when appropriate to resolve a patient's drug-related problem could reasonably lead to a patient not having their drug-related problem effectively resolved. Further, it could reasonably cause the public to be uncertain about the role and value of a pharmacist, particularly with regards to their foundational role in drug therapy management.

Position

It is in the public's best health interest to have a consistent and predictable experience in the scope of needs that will be met by their pharmacy, including that a pharmacy will meet their drug-related needs that require a pharmacy to compound, provide OAT, and/or prescribe within the scope authorized for pharmacists. In support of this, it is the NSCP's position that:

- *Pharmacy owners* ensure that the pharmacy has the necessary space, equipment, policies, and human resources to support its pharmacy practitioners in meeting the needs of its patients, including those related to basic non-sterile compounded drug products customary to community pharmacy practice, OAT, and drug-related problems that can be resolved by a pharmacist prescribing.
- *Pharmacists and pharmacy technicians* maintain their competence to provide basic non-sterile compounded drug products customary to community pharmacy practice and OAT.

- *Pharmacists* maintain their competence to prescribe within their authorized scope.
- *Pharmacists and pharmacy technicians* prepare and provide OAT and basic non-sterile compounded drug products customary to community pharmacy practice that are within the scope of their competence and the capacity of the pharmacy's space, equipment, and human resources.
- *Pharmacists* take all reasonable steps to support patients in resolving their drug-related problem, including through prescribing when it is within their authorized scope.
- *Pharmacy managers* establish a process to ensure a patient's health needs are met when the pharmacy is unable to provide compounding or OAT, or unable to resolve their drug-related problem by a pharmacist prescribing, including taking reasonable steps to assist the patient to have their needs met by another pharmacy in a manner that minimizes inconvenience to the patient.