Standards of Practice: Remote Prescription Processing and Management

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Terminology

The following terms and definitions serve as a reference for these standards.

Term	Definition
Enabling Technology	Any technology used in the provision of remote prescription management and processing. This may include but is not limited to; tele/video conferencing, email, login platforms or other internet-based applications.
Patient Contact Pharmacy	A pharmacy, licensed by the Nova Scotia Pharmacy Regulator, that receives a prescription for, and is the pharmacy point of contact for, the patient.
Pharmacy Practitioners	Pharmacists, pharmacy technicians, interns, pharmacy students, and pharmacy technician candidates registered with the Nova Scotia Pharmacy Regulator.
Remote Pharmacy Employee	Any individual, including both pharmacy practitioners and non-practitioners, working remotely on behalf of a pharmacy licensed by the Nova Scotia Pharmacy Regulator.
Remote Site	A location in Canada where remote prescription management and processing occurs.

INTRODUCTION

The Nova Scotia Pharmacy Regulator (NSPR) recognizes the need for ongoing innovation in pharmacy practice to ensure that patients continue to receive quality care. Increasingly, remote prescription processing and management is being used to enhance patient access to care through increased pharmacy workflow efficiency.

For the purposes of these standards, remote prescription processing and management includes the use of enabling technologies to complete steps in the dispensing process (other than product preparation or packaging) by an individual employed by or working on behalf of a patient contact pharmacy, at a remote site. These steps could include one, or any combination, of the following:

- Data Entry
- Data Verification
- Adjudication
- Drug Utilization Evaluation
- Packaging Verification
- Technical Verification
- Clinical Verification/Determining the Appropriateness of Therapy
- Counseling

> Note: Remote prescription processing and management does not include centralized prescription processing. Centralized prescription processing refers to situations where a Central Fill Pharmacy performs one or more technical tasks related to processing or preparing a drug order on behalf of an Originating Pharmacy. This activity must continue to be conducted in accordance with the *Standards of Practice for Centralized Prescription Processing*.

Processing and managing prescriptions remotely introduces safety, privacy, and confidentiality risks not otherwise associated with traditional on-site pharmacy services. Prior to utilizing this prescription processing strategy, pharmacy managers and owners must understand the risks and take the necessary steps to mitigate them through:

- undertaking a *Privacy Impact Assessment* where required by personal health information legislation.
- establishing and implementing robust policies and procedures that will ensure the accuracy, safety, and security of personal health information during all stages of the dispensing process.

Note: Nothing in these standards supersedes the requirement for a pharmacy to be under the supervision of a pharmacist when open to provide pharmacy services to the public as set out in section 88 of the NSPR bylaws.

STANDARDS OF PRACTICE

Licensing and Responsibilities

1. Remote prescription processing and management can occur when the following conditions are met:

    1.1. A pharmacy practitioner engaged in remote work must be licensed with the Nova Scotia Pharmacy Regulator, regardless of whether they are physically located in Nova Scotia.

    1.2. A remote pharmacy employee must be accountable to the Pharmacy Manager of the patient contact pharmacy.

    > Note: While these standards do not preclude pharmacy practitioners from practicing in a Canadian jurisdiction outside of Nova Scotia, it is the responsibility of the practitioner to ensure that they are meeting any regulatory requirements that may impact their practice in the jurisdiction where they are located.

2. Prescription processing and management must take place in compliance with *Nova Scotia Privacy Legislation*, *Nova Scotia Pharmacy Legislation*, bylaws, standards of practice, and policies.

3. Remote prescription processing and management must take place in Canada.

Pharmacy Manager Responsibilities

Pharmacy Managers ensure the following requirements are met:

4. Remote pharmacy employees are under the oversight of the pharmacy manager of the patient contact pharmacy.

5. Policies and procedures that address all activities associated with processing and

managing prescriptions remotely are established, implemented, and include the appropriate use of enabling technology and how patient confidentiality and the security of personal health information will be maintained, in accordance with any relevant legislation.

5.1. Both remote and on-site employees involved in these activities must receive training on all policies and procedures and on the use of enabling technologies.

6. Patients have provided informed consent for their prescriptions to be processed remotely and understand that it will involve the transfer of personal health information.

7. A communication method that ensures effective communication between the pharmacy and remote employees is in place.

8. Pharmacy practitioners working remotely have access to the same information and resources relevant to the practice activities they are undertaking remotely, that are available at the patient contact pharmacy including, but not limited to, access to; provincial electronics health records (e.g., SHARE, Provider Portal), the requirements in the *Pharmacy Reference Requirements Policy,* and the Quality Related Events reporting database.

9. Processing and managing prescriptions remotely is included as part of the patient contact pharmacy's overall quality assurance program in accordance with the *Standards of Practice: Continuous Quality Assurance Programs in Community Pharmacies.*

10. Access to the pharmacy practice management software (PPMS), the Nova Scotia Drug Information System (DIS), provincial electronics health records, and any other platforms used at the remote site is secure and only available to authorized individuals.

11. Measures are in place at the remote site to:

11.1. ensure that the access, gathering, and use of personal health information is undertaken in accordance with all applicable privacy legislation (e.g., PHIA).

11.2. prevent confidentiality or privacy breaches.

12. A process is in place to identify, address, and report any data or privacy breaches that occur as a result of remote work in accordance with applicable privacy legislation.