



Central Fill Policy Statement

Definitions

Central Fill refers to the processing by a *central fill pharmacy* of a request from an *originating pharmacy* to prepare a drug order or to perform processing functions such as packaging medication to be dispensed by the *originating pharmacy* pursuant to a prescription.

The *central fill pharmacy* is defined as a pharmacy that holds a valid permit from the Saskatchewan College of Pharmacy Professionals (SCPP) acting as an agent of the *originating pharmacy* to fill or process prescription orders.

The *originating pharmacy* is defined as the patient contact pharmacy that holds a valid permit from SCPP that uses a *central fill pharmacy* to fill or process prescription orders.

Responsibilities of Both Pharmacies

1. Except where SCPP has executed a mutual assistance and cooperation agreement, or other agreement or formal understanding of a similar nature with another pharmacy regulatory authority in Canada, both the originating pharmacy and the central fill pharmacy must be located in Saskatchewan and hold a valid permit with the College. Where the exception arises, each pharmacy or pharmacies must be located in one of the jurisdictions party to the above agreement or to the above formal understanding.
2. Pharmacists at both pharmacies are responsible to ensure all prescriptions are valid and are being used for a legitimate medical indication. This does not mean that pharmacists at both pharmacies are required to verify the same prescription, but allows either pharmacist to discontinue the preparation of the prescription if they feel the prescription is not valid.
3. Pharmacists and pharmacy technicians involved in the central processing, the pharmacy manager and owners of both pharmacies are responsible for:
 - a) maintaining the Standards of Practice and complying with all federal and provincial laws and regulations
 - b) the provision of adequate security to protect the privacy, confidentiality and integrity of patient information and product
 - c) accurate record keeping and labeling that is compliant with legislative requirements and bylaws
 - d) maintenance of a mechanism for tracking the prescription drug order through each step in the pharmaceutical care and drug product preparation processes, including information on pharmacy personnel involved
 - e) maintenance of a quality assurance program

4. The originating pharmacy will have a written agreement with the central fill pharmacy, outlining the services to be provided and the responsibilities and requirements of each pharmacy in fulfilling the terms of the agreement in compliance with federal and provincial laws and regulations. The agreement will be signed by the owner and pharmacy manager of the originating pharmacy and the central fill pharmacy. The agreement will be available to SCPP upon request.
5. Maintain a joint policy and procedures manual, outlining but not limited to, the following:
 - a) how the patient confidentiality and privacy of patient health information will be maintained and meet the requirements of provincial and federal legislation
 - b) how the parties will comply with provincial and federal legislation, standards of practice, and regulatory bylaws
 - c) how records will be maintained to identify the responsible pharmacist(s) and other pharmacy staff involved in the various stages of the pharmaceutical care and drug product preparation processes
 - d) the processes involved in the processing of each prescription from the originating pharmacy to the central fill pharmacy and the return to the originating pharmacy for dispensing, including a trail of signatures for every step of the process, as well as the procedures for auditing these processes
 - e) the procedure for ensuring that all prescription labels meet the requirements set forth by the Saskatchewan College of Pharmacy Professionals and the mechanism used to identify all pharmacies involved in dispensing the prescription order on the prescription label or auxiliary label
 - f) how the central fill pharmacy will process the records of request from the originating pharmacy and maintain them for the purposes of filing and record keeping. Including accurate recording keeping of narcotic, controlled drugs and benzodiazepines counts
 - g) the process to establish effective two-way communication between pharmacies on pertinent patient and prescription information
 - h) the quality assurance program in place with participation by both pharmacies involved in the central fill process which objectively and systematically monitors and evaluates the quality and integrity of the process, pursues opportunities to improve patient care, and resolve identified problems

Responsibility of the Originating Pharmacy

1. Receiving the order from the patient or their agent and providing the medication to the patient or their agent. In some situations the Central Fill pharmacy may provide the finished product directly to the patient or patient's agent e.g. long-term care.
2. Meeting the legislative requirements and the terms of the agreement, including but not limited to prescription order entry, filing and storing of the original prescription, and all claims adjudication. The local pharmacy will ensure there is a method of identifying which prescriptions were transmitted to the central fill pharmacy for processing.

3. Meeting all Standards of Practice for care, including but not limited to collecting and documenting all patient relevant information, performing the patient assessment, reviewing all prescriptions for appropriateness, identifying and resolving any drug therapy problems, provide all patient education and information and performing all monitoring and follow up. All interactions with the patient and health care professionals are the responsibility of the originating pharmacy.
4. Ensuring advanced notice is provided to the College of a pharmacy's intent to operate or utilize the services of a central fill pharmacy to ensure compliance with all requirements and legislation. The proposed service must be documented and submitted to the College. It should describe the service and the responsibilities of each party. The service must comply with the *Act* and bylaws.

Responsibility of the Central Fill Pharmacy

1. Meeting the legislative requirements, Standards of Practice and the terms of the agreement, including but not limited to the accuracy of labeling, packaging, processing and record keeping of the drug product preparation, including ensuring the label accurately represent the contents of the package.
2. Keeping a record of all prescriptions filled and to which pharmacy they were supplied. All records will be maintained for two years as per SCPP Regulatory Bylaws or seven years to meet the Canadian Revenue Agency requirements.
3. The safety and integrity of the drug product until received by the originating pharmacy. In situations where the central fill pharmacy delivers the drug product directly to the patient or patient's agent e.g. long-term care, they are responsible for the safety and integrity of the drug product until it is received by the patient or patient's agent.

Labeling Prescriptions

All prescriptions dispensed must be labeled identifying the local community pharmacy and contain all the required information as per section 13 of Part J of the SCPP Regulatory Bylaws. The prescription label, an auxiliary label or a code on the prescription label must indicate that the prescription was filled at a central fill pharmacy and contain the name of the central fill pharmacy.

Patient Consent

All patients must be informed that their prescription may be filled using a central fill pharmacy. It is advisable that the local pharmacy obtain signed consent from the patient to allow for sharing of their personal medical information and prescription information with the central fill pharmacy.

Other Relevant Information

When the agreement includes non-typical arrangements e.g. long-term care or compliance packaging services, then this will be communicated to SCPP. Additional information is required in the policy and procedure manual to ensure all areas of the service are outlined. Also, the responsibilities of each pharmacy with respect to the service will be defined.

References: OCP Policy on Central Fill- OCP
Guidelines for MB Pharmacists wishing to participate in a Centralized Fill

Process: BC Policy on Centralized Prescription Processing
CACDS – Central Fill/Central Processing Proposal
Centralized Prescription Processing (Central Fill) – NSCP

Questions?
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