Prescription Refills and Part Fills

For clarification purposes regarding electronically generated and/or retained records, as per Health Canada’s policy which is described in “Electronic Transmission of Prescriptions Policy Statement and Guidelines for Pharmacists” electronically generated and retained records are acceptable documentation requirements.*

This document is intended to assist pharmacists with complying with the following standards: “………..all activities will be performed in accordance with relevant federal, provincial and territorial legislation, and regulatory authority policies and bylaws regarding the practice of pharmacy” (Model Standards of Practice for Canadian Pharmacists, National Association of Pharmacy Regulatory Authorities, March 2009).

“Where permitted under the law, authorization for refills must be obtained from the prescriber, whether or not the law requires a prescription for a given medication. A pharmacist may accept authority to dispense or refill a prescription only from a practitioner who is legally authorized to prescribe such drugs” (Standards of Practice for Saskatchewan Pharmacists, November 1989).

REFILL DOCUMENTATION

1. For Prescription Drug List Drugs (formerly Schedule F Drugs) included in Schedule I:

   Sections 4, 9 and 10 of Part N of the Saskatchewan College of Pharmacy Professionals (SCPP) Regulatory Bylaws state:

   **Verbal Prescriptions**
   4 The licensed member reducing a verbal prescription to writing shall indicate on the written* record of the prescription:
   
   [...]
   
   (e) the directions for use given with the prescription, including whether or not the practitioner authorized the refilling of the prescription and, if the prescription is to be refilled, the number of times it may be refilled.

   **Refills**
   9 No licensed member shall refill a prescription for a Schedule I drug unless the practitioner so directs and no licensed member shall refill such a prescription more times than the number of times prescribed by the practitioner.

   **Maintaining Records**
   10 The licensed member filling or refilling a prescription for a Schedule I drug shall enter on the original of the prescription or in a suitable record of prescriptions kept under the name of each patient:
   
   (a) the date of filling;
   (b) the date of each refill, if applicable;
   (c) the quantity of drug dispensed at the original filling and each refill: and
   (d) his name.

   The corresponding sections from the Food and Drug Regulations pertaining to the Prescription Drug List drugs (formerly Schedule F). SCPP Bylaws address Schedule 1 and
by default, Prescription Drugs List drugs (excluding drugs found in the Schedules to the Controlled Drugs and Substances Act as they have more stringent regulations).

**Refill Documentation for Prescription Drug List Drugs within Schedule I**

- All the required information must be included in the refill documentation as section 10 of Part N of the SCPP Regulatory Bylaws.

- All refills must be entered into the computer as stated on the written/verbal/faxed prescription.

- PRN is not an acceptable notation for refill information - a number of refills or the period of time from which the number of refills can be reasonably extrapolated is required.

- When a new prescription has refill authorization indicated as a passage of time (for example, refill for two months) then that information must be reflected in the patient profile information and not simply indicated as a number in the refill section of the prescription.

- Refills cannot be “added” to an existing prescription that has either no refills or has had the refills used or expired. Each new prescription must contain its own authorization for refills.

- A new prescription would be required if there was a change in the existing order, including the directions or strength, etc., but not if the brand dispensed changed (SOC).

- Historically, a new prescription cancelled out the refills on all existing prescriptions for that medication. Pharmacists are expected to monitor their patient’s chronic conditions on a regular basis therefore any alteration to monitoring of therapy (time between visits to the practitioner) should be confirmed with the practitioner. Data integrity within PIP must be maintained and pharmacists are reminded to review information provided by e-Health and their software vendor for proper data entry.

- The information can be maintained on the computer profile (see subsection 11(6) of Part J of the SCPP Regulatory Bylaws). A hard copy can be filed in the prescription files in the form of a transaction record for Prescription Drug List drugs in Schedule I.

- All prescription records must be maintained for two (2) years from the date of the last fill/refill in a readily accessible manner. The computer system must maintain the history of the prescription, including all original fills and refills.

- Where prescriptions are provided for residents of a long-term care facility and the renewal authorization comes from the Medication Review Sheets, these review sheets must be filed in a readily retrievable manner for two (2) years from the date of the last fill/refill.
2. For Drugs Listed in the Schedules to the CDSA (Controlled Drugs And Substance Act):

Narcotics

Section 37 of The Narcotic and Controlled Drug Regulations states:

37 A pharmacist shall not use an order or prescription, written or verbal, to dispense a narcotic after the quantity of the narcotic specified in the order or prescription has been dispensed.

A smaller amount of the total quantity often called a PART-FILL may be provided to the patient at specific intervals as directed by the prescriber.

A hard copy or electronically generated and/or retained record of each fill must be produced and dated for the date that smaller specified quantity was provided to the patient. This information must be cross referenced to the original prescription.

Controlled Drugs

Section G03.006 of Part G of the Food and Drug Regulations, which pertains to controlled drugs, states:

G.03.006. A pharmacist shall not refill a prescription for a controlled drug unless
(a) the practitioner, at the time that he issued the prescription, directed in writing, in the case of a controlled drug listed in Part I of the schedule to this Part, or directed in writing or orally, in the case of a controlled drug listed in Part II or III of the schedule to this Part, that the prescription be refilled, the number of times that it may be refilled and the dates for or the intervals between refills; and
(b) the pharmacist keeps a record of each refilling of a prescription.

G.03.008. A pharmacist shall, before dispensing a controlled drug pursuant to a prescription given orally or a verbal order, make a written record thereof, setting forth,
(c) the name and address of the person named in the prescription;
(d) the name, quantity and form of such controlled drug;
(e) the directions for use given therewith;
(f) the name, initials and address of the practitioner who issued the prescription;
(g) the name or initials of the pharmacist who dispensed such controlled drug;
(h) the date such controlled drug was supplied; and
(i) the number assigned to the prescription.

Refills for controlled drugs must include a hard copy paper trail or electronically generated and/or retained record with the date of refill and the next sequential prescription number linking the new refills to the original prescription number if that number changes.

A hard copy or electronically generated and/or retained record of the refill must be produced and dated for the date the medication was provided to the patient.

Benzodiazepines and Targeted Substances

The sections 52 and 53 of the Benzodiazepines and Other Targeted Substance Regulations state:
52 A pharmacist may only refill a prescription for a targeted substance if
(a) the practitioner who prescribed it expressly directs that the prescription may be
refilled and specifies the number of refills;
(b) the pharmacist makes a record of each refill in accordance with section 53;
(c) less than one year has elapsed since the day on which the prescription was
issued by the practitioner;
(d) at least one refill remains on the prescription; and
(e) in the case where an interval between refills has been specified by the
practitioner, it has expired.

53 A pharmacist who fills or refills a prescription for a targeted substance must record
the following information:
(a) the date the prescription was filled;
(b) the quantity of the targeted substance provided at the original filling and at each
refill;
(c) the pharmacist's name or initials; and
(d) the number assigned to the prescription.

Refills for Benzodiazepines and Other Targeted Substances expire after one year
from the date the prescription was issued.

Prescriptions with specified intervals can only be refilled after the interval expires subject to
your professional judgment.

37 A pharmacist shall not use an order or prescription, written or verbal, to dispense a
narcotic after the quantity of the narcotic specified in the order or prescription has been
dispensed.

Prescriptions for narcotics cannot be refilled. A smaller portion of the total quantity on the
prescription can be dispensed as a part fill. All part fills of narcotics must include a hard copy
transaction with the date of the part fill and next sequential prescription number which cross
references the original prescription number on subsequent hard copies of the part fill.

When refilling a controlled drug or part filling a narcotic
- print an extra label or transaction record that includes all the required information
- indicate that the transaction is a refill/part fill
- if the prescription number has changed, indicate the original prescription number of the
  new hard copy
- It is recommended that you indicate the new prescription number (or transaction number
  if the prescription number stays the same) on the original prescription
- File the new hard copy in sequence as to date and prescription number in the special file
  maintained for controlled substance prescriptions

Please refer to your third party payment contacts for more information on “days supply”
and ensure proper documentation is maintained.