



SASKATCHEWAN
COLLEGE OF PHARMACY
PROFESSIONALS

MicroSCOPE

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2019 PAS Conference

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Methadone and buprenorphine/naloxone (Suboxone) practitioners and prescriptions in Regina

The College of Physicians and Surgeons of Saskatchewan (CPSS) has informed the Saskatchewan College of Pharmacy Professionals (SCPP) that in addition to Dr. Ashis Paul, Dr. Rajnikant Patel, practicing at the Parliament Methadone Clinic located at 2637 Dewdney Avenue, will no longer be prescribing methadone or buprenorphine/naloxone (Suboxone) as of midnight May 1, 2019. All prescriptions written by Dr. R. Patel on or before May 1, 2019 may continue to be dispensed until they expire, or the patient obtains a prescription from a new practitioner.

The same [Section 56 exemption](#) under the Controlled Drugs and Substances Act (CDSA) affording pharmacists the ability to prescribe methadone and buprenorphine/naloxone for patients of Dr. A. Paul will be in effect for patients of Dr. R. Patel. Please click [here](#) and review the bulletin board on the SCPP website for further information on the exemption.

The SCPP office has had some inquiries regarding the Section 56 exemption and wishes to clarify:

- The exemption is to be used only for those patients who cannot obtain an appointment to be seen by a practitioner at the Harm Reduction Clinic and no longer have a valid prescription for methadone or buprenorphine/naloxone and would otherwise be lost to care.
- The exemption is not meant to impede or delay a patient from receiving a consultation and care from a practitioner at the Harm Reduction Clinic.
- Even if a patient obtains a prescription from a pharmacist under the exemption, every effort is to be made by the pharmacist to assist the patient in making an appointment to see a practitioner for consultation and care at the Harm Reduction clinic.

The Saskatchewan Health Authority (SHA) emergency response team is working with CPSS to ensure no patient is lost to care. The SHA, in conjunction with the Harm Reduction Clinic has implemented a plan to coordinate the transition of care of patients of Dr. A. Paul's and Dr. R. Patel's to practitioners working at the Harm Reduction Clinic. Pharmacists are reminded to refer all patients of Dr. A. Paul and Dr. R. Patel to the Harm Reduction Clinic for consultation and continuation of care and treatment of substance use disorders. While there may be other practitioners in Regina who are prescribing methadone and/or buprenorphine/naloxone for substance use disorder they may not have the capacity to accept new patients. (more information is available on the SCPP website bulletin board).

For up-to-the-minute information, news and events, visit the homepage of the SCPP website:
www.saskpharm.ca.

MicroSCOPE is published by the Saskatchewan College of Pharmacy Professionals (SCPP) and is emailed to all active members of the College. As the newsletter includes decisions on matters such as regulations, drug schedule changes, etc., SCPP expects all members are aware of these matters.

To download a PDF of this e-newsletter, click [here](#).

Patients who are receiving concurrent therapy for infectious diseases such as HIV and Hepatitis C may be receiving their medications on a daily basis (daily observed therapy DOT) with their Opioid Agonist Therapy and every effort must be made to ensure there is no interruption in therapy. Pharmacists are reminded to review the patient's medication history in the Pharmaceutical Information Program (PIP) and/or the eHealth Viewer and ensure that all current therapy is continued. *More information and resources can be obtained by contacting the following pharmacist:*

Mike Stuber, BSP, AAHIVP
Clinical HIV Pharmacist
Infectious Diseases - Regina General Hospital
306-766-0717 (w) 306-520-4454 (c) michael.stuber@saskhealthauthority.ca

SCPP also wishes to remind all pharmacists that each patient has the right to choose which pharmacy provides their medication and pharmaceutical care services and that it is inappropriate and contrary to ongoing treatment for substance use disorders to provide or offer incentives to patients or conversely to create barriers to patients receiving their care at the pharmacy of their choice.

Advanced Methods Certification (AMC)

Administration of Drugs by Injection and other routes requires members to obtain training from Continuing Professional Development for Pharmacy Professionals (CPDPP), Standard First Aid and CPR Level C with AED training and to maintain the required skills, knowledge and competency to safely administer medications by injection and other routes. Unlike last year, there is no mandatory training update for the 2019-2020 licensing year, however all members who have declared AMC must have completed the previously offered mandatory update training.

Please contact CPDPP for more information on the mandatory update training.

Injection resources from CPDPP can be found at the following link:

<https://pharmacy-nutrition.usask.ca/cpdpp/immunization%20and%20injections.php>

As part of your license renewal you will be asked to declare "Advanced Methods Certification" (AMC).

A condition "A" appears on the license of all members who do not declare AMC.

The 2019/2020 license on-line renewal process will only allow those members who declared Advanced Method Certification for the 2018/2019 licensing year to declare AMC for the 2019/2020 license year. **You cannot administer drugs by injection or other routes without the Advanced Methods Certification declaration through your license application.**

If you did not renew AMC last year or have never applied for AMC you will not be able to automatically apply during the 2019/2020 online license renewal. Please contact Lori Postnikoff at lori.postnikoff@saskpharm.ca for more information.

Injectable Cosmetic Treatments – Neuromodulators and Dermal Fillers

In the November 2016 edition of SCOPE members were informed that the authority to administer drugs by injection and other routes was intended for the purposes of pharmaceutical care and drug therapy management of the patient. Administration is not intended for other purposes, such as cosmetic.

The College of Pharmacists of Manitoba recently published a Position Statement approved by Council on October 15, 2018 entitled “Injection of Neuromodulators and Dermal Fillers” which provided updated information as follows: “ *As specifically stated by Allergan, the manufacture for Botox® Cosmetic product monograph and Health Canada, Botox® Cosmetic should only be administered by physicians with appropriate qualifications and experience in the treatment and in the use of the required equipment...*”

Creating a Stronger Password

In the latest edition of SCOPE the Saskatchewan College of Pharmacy Professionals (SCPP) provided information on upcoming changes to strengthen your password to log into your SCPP member portal. Further communication with our database vendor has resulted in revision to the process.

Effective April 1, 2019 you will be asked to strengthen your password to eight (8) or more characters including a combination of uppercase and lowercase letters as well as numbers and symbols.

The two-step verification process described in the SCOPE newsletter will be implemented later. More information will follow in future communications.

New Fees

As of April 1, 2019 and as detailed in the latest edition of SCOPE https://saskpharm.ca/document/4919/SCOPE_March2019.pdf (bottom of page 4 and continuing on page 5 and 6) the Saskatchewan College of Pharmacy Professional (SCPP) has introduced three new fees and made changes to other fees.

The three new administrative fees are as follows:

1. Failure to File Fee

Effective April 1, 2019 a fee, payable by the proprietor of the pharmacy can be assessed for failing to file information required by SCPP on any proprietary pharmacy permit. This includes failure to file the required information to ensure the permit information is accurate and up to date at all times. As discussed in the latest SCOPE newsletter changes which impact the permit include but are not limited to:

- changes to the proprietor or trade name,
- changes as to the pharmacy manager,
- changes to the ownership including shareholdings,
- changes to the directors, and
- changes to the location or address

During the past year SCPP has noted concerns with permit amendments and applications including but not limited to:

- Application forms which were incomplete or not received;
- Applications which were completed by someone other than the pharmacy manager;
- Corporation documents not received;
- Director requirements not met;
- Permit and /or COMPASS fees unpaid;
- Privacy Officer and/or COMPASS QI coordinator training not completed as per legislative requirements;
- CPhIR Data Sharing Agreement not submitted to ISMP; and
- Other requirements pursuant to *The Pharmacy and Pharmacy Disciplines Act, SS 1996, c P-9.1*, the SCPP Regulatory Bylaws and the SCPP standards and guideline

2. Certificate of Standing Fee

All requests for Certificates of Standing must be completed online by logging into your member portal on the SCPP website and completing the required application. A non-refundable fee of \$100 plus GST will be required for processing the certificate.

3. Pre-Registration Application Fee (for non-members).

This fee is required for all non-members who wish to begin the process of registration and licensure with SCPP. A non-refundable fee of \$200 plus GST is required. Please see the latest edition of SCOPE on page 6 for more details.

Narcotic Invoices

Recently SCPP was asked what processes members needed to have in place when McKesson transitions to electronic invoices and discontinues paper copies being provided to pharmacies when they order pharmaceuticals.

We reached out to Health Canada, National Compliance Section / Office of Controlled Substances and were provided with the following information:

The [Controlled Drugs and Substances Act \(CDSA\)](#) provides the legislative framework to manage records related to handling of controlled substances by pharmacists.

All records must be maintained in such form as to enable an audit to be performed efficiently, on-site, and on the day of the audit, for a period of at least two years.

More pharmacists are moving to a paperless environment and keeping records electronically. Health Canada has no objection to this transition provided that the electronic system chosen meets the requirements of the relevant regulations and that the electronic files are saved in a secure, high resolution format to ensure the information is easily readable. Lastly, pharmacists must have an appropriate backup system to avoid any loss of relevant information.

Regulations under the CDSA require that pharmacists keep receiving records. More specifically, section 30 of the [Narcotic Control Regulations](#) , section G.03.001 of the [Food and Drug Regulations – Part G](#) and section 50 of the [Benzodiazepines and Other Targeted Substances Regulations](#) list the record keeping requirements for controlled substances received from a licensed dealer. Briefly, upon receiving a controlled substance, a pharmacist must enter the following in a book, register or other record maintained for such purposes:

(a) the name and quantity of the controlled substance received;

(b) the date the controlled substance was received; and

(c) the name and address of the person from whom the controlled substance was received.

Please note that:

- A pharmacist may not rely on the records maintained by the licensed dealer.*
- It is important to record the date the controlled substances were received by the pharmacist, not the date the controlled substances were ordered from the licensed dealer, the date the licensed dealer shipped the substances or the date the pharmacist updated their inventory records. Any delay in recording the date the controlled substance was received has been known to contribute to inventory control issues.*

Health Canada expects that all Canadian pharmacists do their part to not only meet their regulatory obligations under the CDSA, but more importantly, to maximize their important role in minimizing diversion of controlled substances at the pharmacy level.

SCPP further advises members to document the date of receipt of the order on the invoice if it differs from the invoice date.