Patient Identification Verification

DEFINITIONS

“Patient’s Agent” is a person who drops off a prescription or picks up medication for the patient.

“Pharmacy team member” includes pharmacy assistants, pharmacy interns, licensed pharmacy technicians, and licensed pharmacists.

ACRONYMS

CDSA – Controlled Drugs and Substances Act
PRP – Prescription Review Program

1. PURPOSE

“As a pharmacist practising in the community, it is your duty and responsibility to make sure the right person gets the right dose of the right drug at the right time. The very first step in providing pharmacy care is to positively identify the patient—be sure you have the right person. Without correctly identifying the patient, the rest of the steps in patient care and patient safety can be compromised.” – College of Pharmacists of British Columbia.

Circumstances in Saskatchewan have prompted the need for an identification policy due to:

1.1. Concerns raised to the College of Physicians and Surgeons of Saskatchewan by public external stakeholders, medication incident reports, increased prescription forgeries and drug diversions, and requests from members of the Saskatchewan public all indicate that pharmacy team members must increase their efforts to confirm the identity of the person to whom medications are provided.

1.2. The Saskatchewan College of Pharmacy Professionals (SCPP) is concerned with reports of hospitalized and incarcerated patients not receiving their medications when picked up by persons claiming to be friends or family members. Diverted medications can pose serious health risks to the individual misusing the medication and to the patient if they do not receive their medication. Medications given to an incorrect patient also poses these same risks.
1.3. Verification of the patient’s (or the patient’s agent) identity will reduce medication errors attributed to the wrong patient receiving medications, proactively address diversion, protect patient confidentiality, and prevent other unintended consequences.

Degree of Verification Required in Application of this Policy

Professional judgement must be used to determine the appropriate degree of verification required to fulfill the intent of this policy, in response to the circumstance of each encounter and risk to the public. **Ultimately, the pharmacy team member is responsible for ensuring that the right individual receives the right medication, and therefore must be satisfied that sufficient verification has been performed.**

Council strongly encourages that steps to thoroughly verify the identity of an individual are taken when the individual is *not known* to the pharmacy team member (as per the Policies and Procedures below). However, Council recognizes that this thorough degree of verification may not be required when the patient is *well known* to the pharmacy team member. **CDSA and PRP medications pose a high risk of harm to patients and the public and therefore require a higher degree of verification when the person picking up the medication is not known to the pharmacy team member.**

Degree of Documentation Required in Application of this Policy

Documentation and record keeping are critical to patient and public safety. Like patient identification verification, the steps vary depending on whether the patient/patients’ agent is known or unknown to the pharmacy team member, and whether they are picking up CDSA and/or PRP medications or schedule 1 drugs. This policy speaks to the documentation and record keeping needed at the time of pick up for a CDSA or PRP medication. For more information see **Record Keeping Requirements** and **Record Keeping Requirements for CDSA**.

For CDSA and PRP medications, if the individual is known to the pharmacy team member or the information was previously documented (e.g. photo-copy of identification, or populated witness ingestion tracking sheet for **Opioid Agonist Therapy**), the requirements in section 2.2 may not be required to record each time a prescription is picked up. However, **the name and signature of the individual picking up the medication must always be obtained at each encounter**. If the patient is not known to the pharmacy team member, then all requirements listed in 2.3 and 2.4 must be recorded, including government issued photo ID as specified.

**Ultimately, pharmacists must keep records of whom they have provided any PRP/CDSA medication and be able to verify with the name and signature of the individual picking up the medication.** This policy outlines minimum requirements for patient identification verification. It extends to all situations where pharmacy services are provided, including delivery of medications and virtual care. The pharmacy manager must implement processes in the pharmacy workflow to ensure that these requirements are met.
2. STANDARDS OF PRACTICE

2.1. It is best practice that each pharmacy team member, when presented with a prescription or a request for a pharmacy service, verify the identity of the patient or patient’s agent and their relationship with the patient, if not known personally to the pharmacy team member.

However, circumstances may arise where a patient is unable to produce suitable identification, therefore, verification of patient identity is:

2.1.1. strongly encouraged for all prescriptions; and
2.1.2. mandatory when dispensing medications monitored by the PRP.

<table>
<thead>
<tr>
<th>Virtual Care (Video and Telephone)</th>
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<td>When a licensed member is providing care through virtual means, the expectations outlined in this document still apply. Over a video connection, patient identity can still be verified by asking the patient to present their identification to the camera to validate identity. When providing care over the telephone, patient identity should be verified with a second identifier such as their date of birth and address.</td>
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2.2. The pharmacy team member must always verify identity, as per Section 3 below, when a patient presents a prescription for a medication listed in the schedules to the CDSA, or monitored by the PRP, unless the patient is known to the pharmacy team member.

2.2.1. If a patient’s agent is not known to the pharmacy team member and is presenting a prescription for a medication listed in the schedules to the CDSA, or monitored by the PRP, then the patient identity must be verified as per Section 3 below where possible; or

2.2.2. Verify the identity of the patient through open ended questions such as the name and birthdate of the patient or address.

2.3. Regardless of whether the patient or patient’s agent is known or unknown, the following information must be documented and retained every time CDSA or PRP medications are picked up:

2.3.1. Name and signature of the person picking up
2.3.2. Date;
2.3.3. Prescription or transaction number; and
2.3.4. Initials of pharmacy team member handing over the medication.
2.4. If the patient or patient’s agent picking up the CDSA or PRP medication is not known to the pharmacy team member then the pharmacy team member must verify identity as per section 3 below, and document:

2.4.1. Type of government-issued photo identification and identification number.

Prescriptions for Drugs with High Risk of Misuse or Abuse

Any prescription for a medication listed in the schedules to the CDSA, or the PRP, where the signature of the physician is not known to the pharmacist, must be verified to ensure it is a valid prescription. See also Forgeries and PRP Physicians with Prescribing Restrictions.

The same caution is recommended when the identity of the patient cannot be confirmed.

2.5. In circumstances where the person comes to pick up medication for another person:

2.5.1. Ensure that the patient has consented to that person obtaining their medication on their behalf either by written or verbal verification;

Mature Minors and Consent

Patients less than 18 years old may exercise their own rights or powers under the Health Information Protection Act (HIPA):

- at the discretion of the pharmacy team;
- must be evaluated on a case-by-case basis; and
- documented in their profile to ensure consistency in their privacy (e.g. consent for parents to pick up their medication and release of their medical information).

For more information on determining whether the patient can be considered a mature minor, see the Office of the Saskatchewan Information and Privacy Commissioner’s Guide to HIPA.

2.5.2. Verification of consent should be confirmed once annually at a minimum.

Obtaining Patient Consent for Patient’s Agents

In the best interest of patient confidentiality and the pharmacy, when the patient presents with a prescription the pharmacy team is encouraged to obtain verbal or written consent of agents allowed to pick up on their behalf, and confirmed once annually at a minimum.
3. POLICIES AND PROCEDURES

3.1. Verifying Identity

3.1.1. Verification of an individual’s identity must be done with either one piece of photo identification issued by the provincial, territorial or federal government, or two sources of reliable information.

3.1.1.1. Document on the patient’s profile that their identity has been verified.

3.1.2. Government-issued photo identification must be original, valid and current. Examples include:

3.1.2.1. Driver’s Licence;
3.1.2.2. Passport;
3.1.2.3. Police Identification Card (Royal Canadian Mounted Police);
3.1.2.4. Certificate of Indian Status;
3.1.2.5. Permanent Resident Card.

3.1.3. Reliable sources of information include copies of a government-issued photo identification, or any statement, form or certificate, including:

3.1.3.1. Non-Photo Provincial Health Card (e.g. Saskatchewan);
3.1.3.2. Birth Certificate;
3.1.3.3. Social Insurance Card;
3.1.3.4. Work/Visitor/Study Permit;
3.1.3.5. Naturalization Certificate;
3.1.3.6. Marriage Certificate;
3.1.3.7. Change of Name Certificate;
3.1.3.8. Travel Visa Issued by a Foreign Government.

3.2. When identification cannot be verified professional judgement must be used to determine the most reasonable approach to meet the needs of the patient in each unique situation.

3.2.1. In circumstances where the person is unable to produce suitable identification, verify their identity by other means, such as asking them open-ended questions to verify their address, phone number and other information unique to the patient.
3.2.2. Where the patient is new to the pharmacy, the minimum or reasonable amount of medication should be provided and only after verification that the prescription is valid.

3.3. **When the Individual Identifies as from Out-of-province**

3.3.1. In addition to steps outlined in sections 3.1 and 3.2, the licensed pharmacy team member must check if a Pharmaceutical Information Program record exists for the purpose of dispensing a medication.

4. **AUTHORITY**

4.1. The Pharmacy and Pharmacy Disciplines Act

4.2. The Controlled Drugs and Substances Act

4.3. The Health Information Protection Act

4.4. Prescription Review Program

5. **ACKNOWLEDGMENTS**

5.1. College of Pharmacists of British Columbia

5.2. Ontario College of Pharmacists

5.3. Financial Transactions and Reports Analysis Centre of Canada

5.4. Office of the Saskatchewan Information and Privacy Commissioner