Pharmacy Manager Supplemental Policy

GLOSSARY OF ACRONYMS
CCCEP – Canadian Council for Continuing Education in Pharmacy
CPDPP – Continuing Professional Development for Pharmacy Professionals, College of Pharmacy and Nutrition, University of Saskatchewan
SCPP – Saskatchewan College of Pharmacy Professionals

1. PURPOSE

Saskatchewan College of Pharmacy Professionals (SCPP) Regulatory Bylaws have been amended to:

- Increase eligibility requirements for pharmacy managers,
- Establish limitations and criteria on the number of pharmacies that a pharmacist may manage,
- Implement interim pharmacy manager requirements, and
- Implement an evaluation and training process for pharmacy managers.

These bylaws allow for the Registrar’s discretion for the above requirements to ensure the public interest is upheld. This policy applies to all pharmacy managers of proprietary pharmacies and outlines the criteria and circumstances that the Registrar will use in making these decisions to implement the bylaw. It is also complemented by the Pharmacy Manager Responsibilities document, which outlines specific responsibilities of pharmacy managers and proprietors.

Mitigating Risks due to Pharmacy Manager Absences

The pharmacy manager fulfills a highly specialized and complex role. In addition to management skills, pharmacy managers also need the knowledge and skills to manage licensed professionals who are subject to the expectations and requirements of a regulatory body. The pharmacy manager must also have extensive knowledge of operating a pharmacy in a regulated environment, within a provincial health care system that is constantly adapting to changes in health technology.

The requirements to operate a pharmacy do not end with the absence of a pharmacy manager.
Due to the unique skillsets and experience this position demands, the SCPP strongly encourages proprietors and their pharmacy managers to proactively plan for pharmacy manager absences that typically occur in the operation of a pharmacy. This proactive approach is especially important in locations challenged with recruitment and retention to minimize interruptions in pharmacy operations due to a pharmacy manager vacancy. See the Pharmacy Manager Responsibilities document to assist with this critical planning.

2. REQUIREMENTS TO BECOME A PHARMACY MANAGER

Direct Patient Care Experience

2.1. The criteria applied by the Registrar in exercising discretion on whether or not to grant an exemption to subsection 11(1)(d) of Part I (pertaining to the 2000 hours requirement as a licensed practising pharmacist in Canada within 36 consecutive months prior to application to become a pharmacy manager) includes, but are not limited to:

2.1.1. All other options have reasonably been exhausted;
2.1.2. There is a shortage of pharmacists either regionally, provincially, or nationally that impacts the availability of qualified pharmacy managers;
2.1.3. There is a demonstratable increase in the demand for pharmacist services that impacts on the availability of qualified pharmacy managers; or
2.1.4. An emergency situation exists.

2.2. For any exemption request outlined in 2.1, a Prior Learning Assessment and Recognition process may be used to ensure the pharmacist demonstrates the knowledge, skills and ability needed to manage a pharmacy in compliance with requirements pertaining to pharmacy operations. This may also include a written application and/or a personal interview with the SCPP, or other process as determined by the Registrar.

Mentorship

The SCPP encourages all new pharmacy managers to self-identify a mentor to support and guide them to optimally perform their role.
Required Training

Council-Approved Pharmacy Manager Training

Even though only licensed practising pharmacists may apply to become a pharmacy manager, SCPP encourages all who impact pharmacy practice to take the manager training program. As part of risk management and succession planning, proprietors should encourage staff pharmacists to take the manager training, especially those who have a leadership role in the pharmacy.

Any licensed pharmacist may complete the training program in preparation for management, even if they are not yet a pharmacy manager.

This training will help existing and prospective managers in identifying knowledge gaps and familiarize themselves with the requirements of managing a pharmacy in the province of Saskatchewan.

2.3. The successful completion of educational programs and requirements approved by Council to demonstrate management competencies, as per subsection 11(1)(e) of Part I, are as follows:

2.3.1. New pharmacy managers and interim pharmacy managers must complete the CPDPP pharmacy manager course (CCCEP-accredited pharmacy manager competencies plus a Saskatchewan-specific module) prior to the start date as pharmacy manager;

2.3.2. Current pharmacy managers must complete CCCEP-accredited pharmacy manager training and the Saskatchewan-specific module, within 6 months of SCPP implementation, as specified by the Registrar;

2.3.3. Pharmacists who have completed CCCEP-accredited pharmacy manager training in another jurisdiction will only be required to complete the Saskatchewan-specific module;

2.3.4. Re-certification of the Saskatchewan-specific module must be completed by all pharmacy managers every 3 years after initial date of completion.

Responsibilities of the Pharmacy Manager

As per section 65 of The Pharmacy and Pharmacy Disciplines Act, pharmacy managers and proprietors must comply with the Act and Bylaws. Failure to comply is grounds for professional misconduct or proprietary misconduct as per sections 25 and 26 of the Act respectively.
To understand all federal and provincial legislation, policies, and standards of practice, the SCPP strongly encourages prospective pharmacy managers and proprietors recruiting pharmacy managers to become familiar with these requirements. A pharmacy manager will be held accountable for meeting all legislative and procedural requirements, regardless of their length of time in the role.

3. ACTIVE PARTICIPATION IN DAILY PRACTICE AND MANAGEMENT OF A PHARMACY

Subsection 11(5) of Part I requires that a pharmacy manager actively participate in the day-to-day practice and management of the pharmacy. Active participation means being physically present on a regular basis to ensure that pharmacy operations and pharmacy professionals are delivering services in accordance with the requirements and expectations of the SCPP. Below are the expectations, as defined by Council, with respect to physical presence in the pharmacy and active participation in the dispensary.

**Definition of a Pharmacy**

For the purposes of the pharmacy manager supplemental policy, a satellite pharmacy or tele-pharmacy is not considered a pharmacy.

3.1 A pharmacy manager may manage up to two pharmacies.

**Physical Presence in the Pharmacy**

**Single Pharmacy**

3.2 The pharmacy manager role is a critical position to ensure the safe operation of a pharmacy, as such the pharmacy manager must be physically present for a minimum of 30 hours per week with at least half of those hours involved in the active practice of pharmacy.

3.2.1 If the pharmacy is open for less than 30 hours per week then the pharmacy manager must be present for all of the operating hours, to ensure they are participating in the active practice of pharmacy in addition to other managerial responsibilities.

**Dual Pharmacies**

3.3 The pharmacy manager of two pharmacies should be physically present at each, in equal proportions, for a minimum of half of the total operating hours, up to 40 hours per
week. As in single pharmacy management, there is an expectation that the pharmacy manager is involved in the active practice of pharmacy in both locations. However, it is recognized a pharmacy manager may need to dedicate more time to one location over another, on occasion.

**Participation in the Dispensary**

3.4. The pharmacy manager must practise in the pharmacy workflow, such that they are familiar with and can ensure the pharmacy environment (e.g. the dispensary and any areas used to provide pharmacy services) supports the safe delivery of pharmacy services, including but not limited to:

3.4.1. Monitoring areas where pharmacy activities occur to ensure compliance with applicable requirements and standards. Situations that may expose patients or staff to inappropriate risk are identified and mitigated (e.g. compounding requirements);

3.4.2. Ensuring certifications are up-to-date, and pharmacy professionals are practising within their competency and scope, and meeting training requirements (e.g. advanced methods certification and first-aid, International Society of Travel Medicine certification for high-risk travel consultations). See [SCPP Training and Development](#) for further details;

3.4.3. Ensuring required equipment is available and in good working order (e.g. refrigeration, compounding tools, secured storage, clinical references);

3.4.4. Checking the pharmacy to ensure it is clean and organized in a manner that regular and relief staff are able to locate and use the resources necessary to provide safe pharmacy services;

3.4.5. Evaluating and adjusting communication and documentation processes to maintain patient confidentiality and information flow amongst all team members (e.g. bylaw and practice changes, program updates, medication incidents);

3.4.6. Overseeing the review and discussion of medication incidents and near misses with pharmacy staff, adjusting processes to eliminate repeat incidents; and communicating with patients and others as appropriate;

3.4.7. Observing pharmacy staff interactions with patients and following up to ensure they uphold the [standards of practice](#) and other SCPP requirements for pharmacists and pharmacy technicians as they fulfil their scope of practice;

3.4.8. Auditing pharmacy team activities required to comply with federal and provincial programs, proprietor agreements, private insurance or any other contracts and address when required (e.g. Saskatchewan Proprietor Agreements, Non-
Insured Health Benefits program, long-term care facility contract, Saskatchewan Medication Assessment Program (SMAPs), Seasonal Influenza Immunization Program); and

3.4.9. Modelling and reinforcing professionalism with pharmacy staff.

PHARMACY MANAGER ABSENCES AND INTERIM PHARMACY MANAGERS

When Existing Pharmacy Manager is Absent

3.5. Pharmacy managers who are away from the pharmacy for 33 days or less (e.g. short-term absences like vacation, short-term sick leave) should delegate a licensed practising pharmacist to oversee day-to-day operations of the pharmacy in their absence.

3.5.1. The designated licensed practising pharmacist responsible should meet the criteria as per subsection 11(1) of Part I.

Delegating Oversight of Daily Operations During Pharmacy Manager Absence

When a manager is on leave, it is best practice to delegate a most responsible pharmacist to oversee daily pharmacy operations in the absence of the pharmacy manager, even if that absence is short term. In addition to the criteria in subsection 11(1) of Part I, this “most responsible pharmacist” should have a strong grasp of pharmacy operations and standards such that they can be relied upon by team members and the public as a primary representative of the pharmacy, and direct the pharmacy team when unique challenges arise.

It is recognized that in some circumstances the most responsible pharmacist may be a part-time or relief pharmacist. In these situations, it is expected that the pharmacy manager or another full-time pharmacist personally provides the proper orientation and training on pharmacy processes to maintain safe patient care, and must be satisfied the part-time or relief pharmacist is sufficiently familiar and competent to be in charge. The pharmacist providing the orientation and training should not be a part-time or relief pharmacist.

Pharmacy managers do not need to report the designation of “most responsible pharmacist” to the SCPP as this would not require a permit change.

However, pharmacy managers who are absent for over 33 days and up to 12 weeks within a 52 week period, must be aware that if they do not appoint an interim
pharmacy manager in their absence, they are still responsible for the operations of the pharmacy as their name remains on the permit.

Reporting to SCPP and permit changes are only required when an interim or new pharmacy manager is appointed.

3.6. An **interim pharmacy manager** should be appointed when the pharmacy manager is on leave or absent for over 33 days and up to 12 weeks, in a period of 52 weeks.

3.6.1. If an interim pharmacy manager is not appointed, then a most responsible licensed pharmacist **must** be designated as per section 3.4. above.

3.7. If the pharmacy manager is on medical leave or otherwise absent from the pharmacy, for over 12 weeks in a period of 52 weeks, then either a new pharmacy manager or an interim pharmacy manager must be appointed. See [Pharmacy Manager Change Guidelines](#).

**When the Pharmacy Manager Resigns or is Dismissed**

3.8. When a pharmacy manager resigns or is no longer employed with the pharmacy, an **interim pharmacy manager** must be appointed if a new pharmacy manager has not been recruited.

**Proprietor Responsibilities After Pharmacy Manager Leaves Position**

Section 20(2) of *The Pharmacy and Pharmacy Disciplines Act* requires proprietors to provide the Registrar with the name of a Practising pharmacist who will be the new pharmacy manager at least 5 days prior, should the existing manager cease.

According to Section 65 of *The Pharmacy and Pharmacy Disciplines Act*, proprietors must comply with the **Act** and **Bylaws**. Failure to comply is grounds for proprietary misconduct as per 26 of the **Act**.

**Extending Interim Pharmacy Manager Term**

3.9. The criteria applied by the Registrar in exercising discretion on approving an interim manager past the 180-day limit in subsection 11(3) of Part I include, but are not limited to:
3.9.1. There is documentation that reasonable efforts have been made to recruit a pharmacy manager, or;

3.9.2. A pharmacy manager exists but is on work leave with an expected return date of no more than one year. Documentation of intended return date must be provided to the Registrar.

4. ADDITIONAL REQUIREMENTS WHEN MANAGING MULTIPLE PHARMACIES

4.1. In accordance with subsection 11(2) of Part I, pharmacy managers who plan to manage a second pharmacy must submit annually, at permit renewal, a written request to the Registrar for approval, stating:

4.1.1. The reason for the request;
4.1.2. The length of time the pharmacist will be manager for more than one site (e.g. interim vs permanent);
4.1.3. That they agree to be physically present at each pharmacy they manage, as per the SCPP’s requirements, and the number of hours they will be physically present and commit to each location;
4.1.4. The distance between the two pharmacies and the plans in place to manage urgent or emergency situations if the pharmacies are not within close proximity;
4.1.5. How the daily operations of the pharmacies will be managed in accordance with federal, provincial and SCPP requirements; and
4.1.6. Their commitment to actively participate in the SCPP’s Quality Improvement Review process as required.

5. SCPP OVERSIGHT AND MONITORING

5.1. The Registrar must be satisfied that the pharmacist meets the criteria and will be able to fulfill the responsibilities of the pharmacy manager role, and may develop additional processes and procedures to ensure that the pharmacy managers meet the professional development needs as identified by the SCPP. This may include but not be limited to the Quality Improvement Review process and other re-certification processes.