

COVID-19 Occupational Health & Safety Testing in Community Pharmacies (“Test to Protect”)

Pharmacy involvement in testing is governed by three regulatory frameworks:

The [Food and Drugs Act](#) and [Medical Devices Regulations](#) govern the **sale and import of medical devices in Canada**,

AND

[The Medical Laboratory Licensing Act](#) and [The Medical Laboratory Licensing Regulations](#) govern **medical laboratories and testing in the province**,

AND

[The Pharmacy and Pharmacy Disciplines Act](#) and SCPP Regulatory Bylaws govern **pharmacy professionals and pharmacies implementing occupational health & safety testing**.

To support the emergency public health measures, federal [interim enforcement orders](#) have been issued about COVID-19 rapid antigen detection tests (in effect [until Dec. 31, 2023](#)), and amendments have been made to the *Medical Laboratory Licensing Regulations* (see [announcement](#)) and SCPP [regulatory bylaws](#).

To support the occupational health & safety of the extended healthcare workforce:

- Time-bound: The Registrar enacts the emergency bylaws to perform approved COVID rapid antigen testing and provide the results thereof to be in effect as of May 10, 2021 and until Dec. 31, 2023 unless otherwise specified by the SCPP Registrar.
- Approved COVID rapid antigen tests as communicated by the federal and provincial governments. See the following for more information :
 - ▶ Smaller and medium-sized businesses ([see here](#));
 - ▶ All other private businesses are referred to the [federal program](#).
- Professional relationship not required to perform tests or provide test results to those who have received a rapid antigen test.
- Follow up must be according to applicable provincial and federal protocols.
- Must be performed in accordance with the terms and conditions of the federal or provincial workplace screening programs, as applicable:
 - ▶ Occupational health & safety purposes only;
 - ▶ Asymptomatic eligible patients and employees only (see Question 2);
 - ▶ Compulsory training, or as per manufacturer’s package insert if training not available;
 - ▶ Data collection & reporting as per federal or provincial program, as applicable;
- Documentation of rapid antigen test provided to patients on the patient’s pharmacy profile as per SCPP requirements (see Question 6)

Overview of SCPP Emergency Provisions

Q1 Who can perform COVID rapid antigen testing and on whom?

- **Pharmacists** may (Authority comes from both regulatory frameworks):
 - ▶ Test pharmacy staff (includes pharmacy assistants and all other store employees)
 - ▶ Test patients when needed to provide in-person care or counselling (that will be beyond 15 minutes of contact time)
- **Pharmacy Assistants** may only test **pharmacy and store employees**, under direct supervision of a pharmacist. They are not authorized to perform tests on members of the public. (non-regulated, both regulatory frameworks)
- Note: As per Section 23 of the Act, Pharmacy Technicians and Pharmacy Student and Extended Interns **are not** permitted to perform COVID rapid antigen tests (*The Pharmacy and Pharmacy Disciplines Act* and SCPP Regulatory Bylaws)

Q2 Who can be tested in the pharmacy?

- Asymptomatic pharmacy staff and store employees only
- Asymptomatic patients **only** when needed to provide prolonged (greater than 15 minutes), close contact, in-person patient care or counselling.

Q3 What COVID rapid antigen tests may I use?

- Pharmacies must only use COVID rapid antigen tests provided through the provincial or federal programs.

Q4

Who can give test results?

- Only pharmacists may provide test results from the COVID rapid antigen tests **to patients**, providing they have taken the required training. Providing a positive test result is a delicate and stressful conversation, where proper counselling may be critical. This clinical function must be performed in accordance with SCPP regulatory bylaws and [provincial protocols](#), when applicable.
- As per Section 23 of *The Pharmacy and Pharmacy Disciplines Act*, providing test results **may not be delegated** to pharmacy technicians, pharmacy student or extended interns. (clinical component, *The Pharmacy and Pharmacy Disciplines Act* and SCPP Regulatory Bylaws).
- Pharmacy assistants are not regulated. Therefore, the SCPP encourages employers to follow up with the federal and/or provincial program and their own insurance providers to determine the conditions for pharmacy assistants when providing test results to staff. **Note: Pharmacy assistants are not permitted to perform tests on patients nor provide test results to patients.**
- Note: At this time, pharmacists are only permitted to provide test results to those individuals who have received a rapid antigen test through the pharmacy. Emergency provisions to provide COVID-19 test results from the eHR viewer **are not** enacted at this time as this requires further consultation and collaboration with our health system partners.

Q5

What happens when someone tests positive?

Pharmacists must follow up as outlined in the provincial protocols, when applicable. (see [Government of Saskatchewan website](#)).

Q6

What documentation and reporting is required?

- SCPP requires documentation of the rapid antigen test used in the patient's pharmacy profile (including brand/model of test, Health Canada device identifier, lot number, test result, and actions taken), stored in a retrievable format.
- Pharmacists must also comply with any follow-up action as directed by the federal or provincial programs (e.g., reporting of positive test results to public health as well as usage of tests), when required. See [Government of Saskatchewan website](#).

Q7

What insurance do I need?

- **Pharmacists** – malpractice insurance when practicing within conditions set by the SCPP (The Pharmacy and Pharmacy Disciplines Act and SCPP Regulatory Bylaws)
- **Pharmacy Assistants** – under supervising pharmacist's malpractice insurance (The Pharmacy and Pharmacy Disciplines Act and SCPP Regulatory Bylaws)
- **Proprietors** – maintain coverage at level prudent for community pharmacies as required to implement the federal or provincial programs, as occupational health and safety activities are being provided in the workplace by non-regulated staff (i.e., pharmacy assistants).

Note: SCPP is not an insurance provider and therefore recommends that pharmacists and proprietors confirm coverage requirements under their malpractice and/or business insurance.

Q8

Where can I find more information?

Monitor the SCPP [COVID-19 web page](#). SCPP will only respond to questions that are regulatory in nature. For all other questions please visit the [Government of Saskatchewan](#) website.

See [Medical Devices Compliance Program Bulletin](#) for most current federal interim enforcement approach.

Also see the SCPP suite of laboratory documents. These must be reviewed as a whole:

- [Laboratory Tests and Medical Devices – Accessing, Ordering, Performing, Using or Interpreting](#)
- [Performing Tests for Drug Therapy Management](#)
- [Sale and Distribution of Medical Testing Devices and Other Diagnostic Products](#)

