

Practice Direction: Virtual Care

Scope and Objective

1.0 Expected Outcome

- 1.1 This document is a practice direction of Council and exists through the authority of the Pharmaceutical Regulation to *The Pharmaceutical Act (Regulation)* and *The Pharmaceutical Act*. This Practice Direction sets out the requirements and standards for providing virtual care.

2.0 Document Jurisdiction (Area of Practice)

- 2.1 All pharmacists are expected to adhere to this Practice Direction.
- 2.2 This Practice Direction does not apply to consultations or communications between pharmacists, nor to communications between pharmacists and other regulated health professionals.

Practice Direction

3.0 Definitions

“Informed consent” is defined in the Practice Direction: Informed Consent.

“In-person care” is the delivery of pharmacy care services where the patient or their agent and the pharmacist are physically located in the same location within Manitoba.

“Personal health information” is defined in [The Personal Health Information Act, CCSM c P33.5](#).

“Therapeutic relationship” is a planned, goal-oriented covenant between a pharmacist and a patient for the purpose of achieving positive health-related outcomes. The therapeutic relationship between a pharmacist and a patient is one with fiduciary responsibility. This relationship is held to a high standard, as outlined by [The Code of Ethics](#).

“Virtual care” is the delivery of pharmacy care services remotely using secure enabling technology, where the patient or their agent and the pharmacist are in different locations. This definition does not include the act of dispensing (apart from counselling) or communications that are administrative or clerical in nature (e.g. interactions that are also appropriate for assigning to unregulated personnel due to their nature or that don’t require a therapeutic relationship).

4.0 Appropriateness of Virtual Care

- 4.1 A blended care model, balancing in-person and virtual care, is required in the provision



- of virtual pharmacy care services, whenever and wherever possible.
- 4.2 Pharmacists must use professional judgment, in collaboration with the patient and/or their agent, to determine if virtual care is appropriate.
 - 4.3 Virtual care is **not** appropriate in the following circumstances:
 - 4.3.1 The patient or agent requests in-person care.
 - 4.3.2 In-person care is clinically indicated or is in the patient's best interest, including when the patient requires a physical assessment or an assessment that requires in-person observation.
 - 4.4 When determining whether virtual care is appropriate and in the patient's best interest, the following must be considered:
 - 4.4.1 The nature of the patient's condition and care required, including whether physical examination is required to meet the standard of care;
 - 4.4.2 The patient's specific circumstances and preferences; and
 - 4.4.3 Access to technology that provides virtual care in a confidential manner.

5.0 Technological Capacity

- 5.1 Before providing virtual care from a pharmacy, the pharmacy manager must develop policies and procedures, including but not limited to:
 - 5.1.1 Clear and comprehensive written standard operating procedures for all technology used in virtual care; and
 - 5.1.2 A contingency plan for technology interruptions, including a process to ensure the patient's health is not compromised during a service interruption.
- 5.2 Any technology used to provide virtual care must meet the following requirements:
 - 5.2.1 The patient's health information is not stored outside Canada;
 - 5.2.2 There are reasonable administrative, technical, and physical safeguards protecting the security and integrity of data and maintaining confidentiality of personal health information and privacy of the patient; and
 - 5.2.3 The technology used for virtual care must not make a recording of the virtual care provided, without the patient or their agent's explicit consent.
- 5.3 Pharmacists must ensure they have the requisite knowledge, skill, and judgment (including technological knowledge and skill) to provide or perform virtual care appropriate to their area of practice. This includes ensuring that:
 - 5.3.1 The pharmacist has access to any information required to provide quality care to the patient;
 - 5.3.2 The technology used for virtual care allows the pharmacist to identify and take appropriate action for any drug related problems, as defined in the [Practice Direction: Ensuring Patient Safety](#);
 - 5.3.3 The pharmacist is able to appropriately refer the patient to other health professionals, if required;
 - 5.3.4 The pharmacist conducts relevant follow-up to the virtual care they have provided (which may involve in-person care); and
 - 5.3.5 The technology used for virtual care is functioning properly and maintains adequate connectivity to support the virtual care provided.



6.0 Requirements When Providing Virtual Care

- 6.1 Providing patient care virtually does not alter the ethical, professional, and legal obligations of pharmacists to practice in accordance with the requirements of all applicable legislation, regulation, practice directions, and guidelines, as they would when providing in-person care.
- 6.2 Pharmacists providing virtual care enter into a therapeutic relationship with the patient. In doing so, pharmacists must:
 - 6.2.1 Disclose their identity, role, and practice location to the patient and/or agent;
 - 6.2.1.1 The pharmacist must be able to provide the patient and/or their agent with a copy of their license, if requested.
 - 6.2.2 Confirm the patient's identity and that they are in a setting that is appropriate and sufficiently confidential to receive virtual care;
 - 6.2.2.1 If no prior therapeutic relationship exists with the patient, the pharmacist must take additional steps to confirm the patient's identity, such as requesting multiple identifiers.
 - 6.2.3 Obtain the patient or agent's informed consent to receive virtual care, including the following:
 - 6.2.3.1 Confirm the patient or their agent understands and acknowledges the risks and limitations of virtual care; and
 - 6.2.3.2 Explain to the patient or their agent how their privacy and confidentiality will be protected.
 - 6.2.4 Ensure the information exchanged is not hindered by the technology being used;
 - 6.2.5 Ensure the patient or their agent understands the appropriate steps for service interruptions, adverse events, or emergencies; and
 - 6.2.6 Ensure the patient or their agent is aware of how they may contact the pharmacist for follow-up.

7.0 Documentation

- 7.1 In addition to documentation required by other legislation, regulation, and practice directions, a pharmacist providing virtual care must document the following in the patient's record:
 - 7.1.1 The informed consent of the patient and/or agent to receive virtual care; and
 - 7.1.2 The time, date, and technology used to provide virtual care.

8.0 Compliance Adjudication

- 8.1 All documentation must be readily accessible and open to regulatory review.

9.0 Appendices

- 9.1 Not applicable



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A Practice Direction is a written statement made by Council for the purposes of giving direction to members and owners about the conduct of their practice or pharmacy operations. Compliance with practice directions is required under the Pharmaceutical Act.

The process for development, consultation, implementation, appeal and review is published on the CPhM website.

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