

Practice Direction

Delegation of Dispensing to Other Health Professionals

1.0 Scope and Objective:

1.1 Expected Outcome

This document is a practice direction by Council concerning the dispensing of a prescription medication by a health professional other than a licensed pharmacist through the authority of *The Pharmaceutical Regulations* to *The Pharmaceutical Act* and *The Pharmaceutical Act*. In accordance with this practice direction, a member may delegate to a person practising as a health professional under an enactment the task of dispensing a drug, if the member has approved filling the prescription and the standards of practice related to counselling the patient are met.

1.2 Document Jurisdiction (Area of Practice)

All licensed pharmacists are expected to adhere to this practice direction. This practice direction is created under section 63 of *The Pharmaceutical Regulations* and is not applicable to Part 11 of *The Pharmaceutical Regulations* in that it does not address pharmacist relationships with health professionals approved under the Dispensing Practitioners' Committee.

1.3 Regulatory Authority Reference

Section 63 of *The Pharmaceutical Regulations* to the *Pharmaceutical Act* empowers the Council to create a practice direction for the delegation of dispensing to other health professionals, once the pharmacist has approved filling the prescription and the Standards of Practice related to counselling the patient are met.

1.4 Definitions

The definition of "health professional" will be the same as is defined in the *Personal Health Information Act*. A health professional is a person who is licensed or registered to provide health care under an Act of the Legislature or who is a member of a class of persons designated as health professionals in the regulations.

2.0 Practice Direction

2.1 A licensed pharmacist may delegate to a person practicing as a health professional under an enactment the task of dispensing a drug if:

2.1.1 The subject community does not have access to a licensed pharmacy or other reasonable access to pharmaceutical care direct from the pharmacist nor to a health professional approved under the Dispensing Practitioner's Committee referred to in Part 11 of *The Regulations*,

2.1.2 There must be an agreement between the pharmacy and the delegated

health professional's place of work.

2.1.2.1 The agreement must outline the services and responsibilities ensuring all Manitoba and Canadian legislative requirements are met including but not limited to *The Personal Health Information Act* and the *Personal Information Protection and Electronic Documents Act*.

2.1.3 The place of storage and release of medications dispensed by the delegated health professional(s) should be a health care facility.

2.2 The procedure to be followed in delegating the task of dispensing a drug will include:

2.2.1 The prescription will be sent to a licensed pharmacy in a means that complies with *The Pharmaceutical Act and Regulations*.

2.2.2 The licensed pharmacist in a pharmacy will prepare the drug for dispensing.

2.2.3 The pharmacy manager will ensure a secure transport of the medication to the delegated health professional's place of work (e.g. clinic, office, etc.) in accordance with *The Pharmaceutical Act and Regulations*.

2.2.4 The pharmacy manager will ensure that policy is in place for secure storage of all medications at the health professional's place of work (e.g. clinic, office, etc.) as required by the agreement referred to in 2.1.2

2.2.5 The delegated health professional(s) will dispense the medication to the patient or their agent in accordance with *The Pharmaceutical Act and Regulations*.

2.2.6 Under this arrangement, the licensed pharmacy manager is responsible for ensuring the standards of practice related to counselling the patient are met.

2.2.7 The pharmacy manager must be assured that the health professional receiving the medication for dispensing complies with protecting patient privacy as required by the *Personal Health Information Act {PHIA}*.

2.3 The pharmacy manager and the health professional shall establish a procedure that ensures patient counselling occurs prior to the medication being dispensed (released) to the patient.

2.3.1 The delegated health professional(s) shall maintain a record of medications dispensed which at minimum includes the patient name, date the medication is received at the health professional's place of work, date the medication is released to the patient.

2.4 The pharmacy manager and the delegated health professional(s) shall establish a procedure in regards to continued unsuccessful attempts to contact the patient, storage of medications that are not received by the patient from the delegated health professional(s), or the return of medication to the pharmacy.

2.5 The pharmacy manager and the delegated health professional(s) shall establish a procedure to ensure that there is a process in place to address medication incidents and discrepancies that may occur.

3.0 Compliance Adjudication

- 3.1 The pharmacy manager shall maintain records of their communications and/or discussions with the delegated health professional(s) who dispense medication on behalf of the pharmacy. This documentation should be in a clear and secure format acceptable to the College of Pharmacists of Manitoba and easily retrievable should review of the information be necessary.
- 3.2 Dispensing health professionals must comply with documentation requirements as outlined in *The Pharmaceutical Act* and its applicable Regulations, Standards of Practice and Practice Directions.
- 3.3 All documentation must be readily accessible and open to regulatory review by both the College of Pharmacists of Manitoba and the health professional's regulatory authority.

4.0 Appendices

Not applicable

A College 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 has been published on the MPhA website.

Development Source:	Standards of Practice Committee
Regulatory Reference:	Section 56(1), 56(2), 63 <i>The Pharmaceutical Regulations</i>
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