



College of Pharmacists of Manitoba

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Policy Statement: Practice Directions

Bill 41, *The Pharmaceutical Act December 2006*, defines a “practice direction” as follows:

"practice direction" means a written statement made by the council for the purpose of giving direction to members and owners about the conduct of their practices or pharmacy operations.

Practice Directions carry similar legal significance to Regulations, and thus it is important that the formation of a Practice Direction is made with due diligence, and is subject to analysis, review and response.

The College of Pharmacists of Manitoba (College) consulted with the Manitoba Society of Pharmacists in the development of this policy for College Council to develop, implement and maintain Practice Directions. This policy enables members and other interested third parties to be fully consulted in the development and implementation of Practice Directions.

IDENTIFICATION OF PRACTICE DIRECTIONS

A Practice Direction must:

1. have clearly defined and specific objectives that are directly linked to clear and verifiable outcomes,
2. be of the level necessary to achieve stated objectives,
3. serve the public interest consistent with the mandate of the College,
4. allow for periodic assessment of its effectiveness and be subject to regular reviews of a minimum of every 5 years, and,
5. be published by Council in a standard form.

CONSULTATION, FEEDBACK AND DEVELOPMENT

The consultation and development process includes:

1. Council refers the concept to appropriate committee(s) and/or ad hoc committee(s) (and includes an environmental scan).
2. Council consults pertinent third parties, and as necessary, representatives of the general public.
3. Council informs and provides members and other third parties with a copy of the proposed Practice Direction(s) on the standard form along with an appropriate time line for response.
4. Members provide feedback or express concerns according to the process noted below under A.
5. Council considers all feedback to the proposed Practice Direction, makes any further appropriate changes and may convene a special general meeting for the purpose of information, education and final consideration of feedback by the members.
6. Council will provide a response to all motions arising at a Special General Meeting in writing within 90 days of the date of the Special General Meeting.

FEEDBACK PROCESS

A) At any time, Members may provide written feedback that must:

1. be forwarded to the Registrar and/or President,
2. include clearly defined objectives with supporting rationale,
3. at the discretion of the Chair of the Standards of Practice Committee, recommendations for major changes to Practice Directions based on feedback from members and / or stakeholders will be shared with the Committee,
4. be reported to the next meeting of Council, where the author of the document may be asked to make a presentation.
5. The outcome of Council’s deliberation will be reported in the minutes of the Council meeting and posted as per Council policy.

- B) At any time and upon a written request signed by at least 5% of the members of the College entitled to vote, members may require Council to convene a Special General Meeting for the purpose specified in the request (e.g. concerns regarding a Practice Direction).

After giving notice of the time and place of the meeting in accordance with the by-laws, Council must convene a Special General Meeting for the declared purpose (and include any resolution provided to Council from the petitioning members).

The convened meeting must comply with By-law 3.06, that states: *The chair of the general meeting may permit discussion and acceptance of motions and resolutions that (i) are for information and do not require consideration by the College; or (ii) make recommendations to Council with respect to any policy and business matter of the College. All motions accepted pursuant to subsection 3.06(a)(ii) hereof must be forwarded to Council for consideration.*

Council is committed to ensuring broad member participation in Special General Meetings. Special General Meetings in the recent past have included teleconference technology and the ability to participate in voting at the MBTelehealth sites. Council will continue to look at ways of expanding external participation and voting through a review of the voting procedures described in the by-laws of the College.

Council will provide a response to all motions arising at a Special General Meeting in writing within 90 days of the date of the Special General Meeting.

APPROVAL AND IMPLEMENTATION

Council must:

1. consider the feedback and responses in conjunction with results of the development process before the final approval of the Practice Direction,
2. balancing the requirements of a Practice Direction and public safety, will attempt to provide redress for members' outstanding concerns,
3. establish an appropriate implementation period,
4. notify the members, third parties and appropriate regulated health professions describing the objective(s) and desired outcomes of the Practice Direction(s), and,
5. educate the members and third parties.

REVIEW PROCESS

Council must, within five years, review and assess the Practice Direction(s) and any relevant information to ensure effectiveness and appropriateness. The feedback processes listed above are available to members at any time should they have further concerns.

URGENT MATTERS

Notwithstanding the protocol outlined in this joint statement, Council reserves the ability to develop Practice Directions on an urgent basis, in response to a pandemic, public health crisis, or other similar extenuating circumstances. Should Council develop any Practice Direction without first adhering to the process outlined in this policy, Council must comply with the review and feedback process at the earliest opportunity.

Notes:

Consultation and Development were identified as the most important step in the process of creation of a Practice Direction. It is critical that at this point, every effort is made to involve the membership and all stakeholders. A major intent of the Implementation component is to ensure that an appropriate length of time is given before a Practice Direction comes into effect, to allow time for compliance. Education of the membership at this point is considered imperative.

Review Date: 2014 11 19 (by Standards of Practice Committee)

Date of Revision: 2014 12 08 (Approved by Council)