



May 24, 2021

Ms. Nancy Lum-Wilson
CEO and Registrar, Ontario College of Pharmacists
483 Huron St
Toronto, ON M5R 2R4
Email: nlumwilson@ocpinfo.com

RE: Cross-Jurisdictional Pharmacy Services Policy – Open Consultation

Dear Ms. Nancy Lum-Wilson,

I am writing to you on behalf of the Canadian Society of Hospital Pharmacists Ontario Branch (CSHP OB) to provide feedback regarding the draft Cross-Jurisdictional Pharmacy Services Policy, which combines and updates the current Prescriptions – Out of Country Policy and Out of Province Prescriptions fact sheet. The goal of the policy is to clarify legal requirements and regulatory expectations related to providing pharmacy services across jurisdictions; further clarifications are suggested to determine if this policy may restrict current hospital pharmacy practice and alignment with telemedicine practices and policies are recommended. Universality in pharmacy practice, as it relates to cognitive services, is recommended.

Many Ontario hospitals provide care to out-of-province patients, including specialty care and specialized medicines. Hospitals on the border of Quebec and Manitoba regularly provide care to out-of-province patients. The draft policy specifies the College's expectations for the provision of pharmacy services to patients located in other Canadian jurisdictions. Pharmacists providing pharmacy services to patients that are physically located in another Canadian jurisdiction must be aware of, and comply with, the law, regulations, standards and policies, and any other practice requirements applicable in the jurisdiction where the patient is located. Clarification on the level of awareness and specifics of what requires compliance is suggested. Depending on the specifics, this could be restrictive to hospital pharmacists in Ontario who may not currently be aware of the specifics and/or may not be licensed to practice in other jurisdictions. For example, some pharmacists currently provide virtual care, including telephone consultation, to patients in other Canadian jurisdictions. Unintended consequences could include:

1. Out-of-province patients receiving suboptimal care compared to Ontario patients, as pharmacists may opt-out of providing virtual care (including telephone advice).
2. Ontario hospital pharmacists in providing virtual care will be facing an increased liability.
3. This virtual care policy may become the model for other regulated health professions and restrict more patients from receiving optimal virtual care.

Should you have any questions, please do not hesitate to contact me at your earliest convenience. Thank you for the opportunity to provide feedback.

Yours sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Olivia Ng
President, CSHP Ontario Branch