



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: Virtual Care 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 Virtual Care Policy. With this emerging area of practice, the goal of the policy is to outline practice expectations for registrants providing care to patients using virtual approaches.

Prior to the pandemic, Ontario hospitals already provided care using approaches that were not face-to-face, including telephone consultations and video consultations. The definition in the draft policy lists examples of virtual care, such as videoconferencing, and discusses ensuring a safe and appropriate environment, such as maintaining an Internet connection. However, it is unclear whether the definition includes telephone consultations. Clarification on whether this is included would be helpful to determine how this may impact current practice and alignment with the definition of telepharmacy in the [CSHP Telepharmacy: Guidelines document](#).

Throughout a virtual care interaction, there may be times when only the substitute decision maker is available, in place of the patient. The role of the substitute decision maker is outlined when obtaining informed consent. It may be considered that assessing the appropriateness of virtual care delivery and maintaining privacy and confidentiality may also involve the substitute decision maker, rather than the patient personally.

It is worthy to note that limitations exist in a hospital to secure a provide room or environment for providing virtual care. In addition, consideration could be given to the fact that patients are not new to a pharmacy in the inpatient hospital setting, but rather already admitted to the hospital system.

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,

Olivia Ng
President, CSHP Ontario Branch