



Rationale for Proposed Amendments (Bill 7) to the *Pharmacy Act*  
Law Amendments Committee  
November 17, 2010

Bill 7 provides the legislative authority in the *Pharmacy Act* for:

1. the creation of a Registration Appeals Committee and process
2. the authority and regulation of pharmacists ordering, receiving, conducting and interpreting tests needed to properly manage drug therapy
3. the authority and regulation of pharmacists administering drugs including vaccines by injection

The establishment of a **Registration Appeals Committee** for the Nova Scotia College of Pharmacists and a registration appeals process will ensure that a person applying to enter the practice of pharmacy can appeal the College's refusal to license that person or the conditions that the College may have placed on their license to practice pharmacy. This amendment satisfies the revised Chapter 7 of the federal *Agreement on Internal Trade (AIT)* and Nova Scotia's *Fair Registration Practices Act (FRPA)* which provides clear requirements regarding the registration process while promoting fairness, objectivity, and transparency.

Managing an individual's drug therapy using monitoring tests optimizes pharmacotherapy by maximizing therapeutic efficacy while minimizing adverse events. Section 25 of the *Pharmacy Act* currently requires pharmacists not only to ensure the therapeutic appropriateness of prescribed drug therapy for their patients but also to monitor this drug therapy. An essential component of this requirement is the **ordering, receiving, conducting and interpreting of monitoring tests**. Pharmacists, given their extensive background in pharmacokinetic principles, are optimally suited for an increased role in the ordering, receiving, conducting and interpreting of tests within the practice of pharmacy. Although it has been suggested that the authority for pharmacists to undertake these activities is already enabled by s.25 of the *Act*, the Nova Scotia College of Pharmacists is of the position that further clarification of this authority is needed to enable the creation of a framework of regulations, standards and a quality assurance program around the provision of these services by pharmacists and to ensure professional responsibility and accountability. These standards will be developed in collaboration with our health professional colleagues including physicians, nurses and medical laboratory technologists and will be consistent with what is happening across the country. In fact, the proposed amendments are similar to those approved in New Brunswick several years ago.

In order to enable and commit Nova Scotia pharmacists to more fully utilize their skills and competencies so that they can be properly deployed within the Nova Scotia healthcare system and respond to the stresses currently placed upon the delivery of healthcare in the province, amendments to the current legislation are being sought to provide for the legislative authority to make regulations authorizing pharmacists to **administer drugs**, including vaccines by injection. Pharmacists are in a key position to play an important role in combating vaccine-preventable diseases in Nova Scotia. Pharmacists are highly trained experts who are familiar with direct patient care and have the knowledge and expertise to help identify patients who need vaccinations based upon their medication use or disease-based risk factors. They are experienced in cold-chain storage, the handling and safe-guarding of medications and are the most accessible members of the health care team, conveniently located in patients' neighborhoods and often open for extended hours.

In other jurisdictions, pharmacist immunization initiatives have proven very effective. Alberta pharmacists have been administering vaccines since 2007. The legislative authority to administer injections has also been granted to pharmacists in BC, MB, NB, and most recently in ON. Pharmacists in all 50 US states have been authorized to give routine vaccinations since the mid-90s. According to the data, there has been a significant improvement in vaccine rates since this authority was granted. The literature demonstrates that, contrary to the concerns of some physicians, pharmacists have not reduced the number of immunizations provided by physicians but rather have attracted a whole new set of patients seeking to be immunized. In fact, when pharmacists expanded vaccinations services in some US states, physicians gave even more vaccinations than previous years.

Dalhousie University recently developed a comprehensive education/training program for pharmacists based upon the Public Health Agency of Canada's nationally approved competencies and guidelines and many Nova Scotia pharmacists are already trained and ready to provide immunization services.

In summary, the current demands on the healthcare system in Canada have placed increased pressure on pharmacists to more fully use their expert knowledge and skills to help fill existing gaps in care. As efficiencies are being sought throughout the healthcare system to take full advantage of all healthcare professionals, the pharmacy profession has the responsibility to align pharmacy services to better meet the population's needs. The status quo is not an option for a sustainable healthcare system.

The proposed amendments to the *Pharmacy Act* are the result of the Nova Scotia College of Pharmacists' efforts to enable and commit Nova Scotia pharmacists to more fully utilize their skills and competencies so that they can be properly deployed within the Nova Scotia healthcare system and respond to the stresses currently placed upon the delivery of healthcare in the province. The amendments authorize pharmacists to administer drugs, including vaccines by injection when properly certified. They also clarify the current legislation regarding the pharmacist's role in monitoring drug therapy. They enable pharmacists to effectively carry out the intent and purpose of the Pharmacy Act, including s.25 which currently states that pharmacists are responsible for the provision of optimal patient care, for the monitoring of drug therapy and for taking all reasonable steps to ensure the pharmaceutical and therapeutic appropriateness of drug therapy.

The proposed amendments are consistent with the recommendations for pharmacy practice found in a multitude of studies and reports on healthcare including those authored by Mazankowski, Kirby and Romanow; Nova Scotia's Report on Primary Healthcare Renewal; the province's current Collaborative Care Model; and the 2008 Canadian "Blueprint for Pharmacy", a report developed by a task force that included input from health care professionals including Nova Scotia physicians and nurses. The amendments are consistent with the direction of pharmacy practice across the Canada, the US and Europe.

The amendments will not only authorize pharmacists to provide expanded services where appropriate and within the practice of pharmacy, but they will also confirm the requirement for associated standards of practice, ethical codes and a quality assurance program and will ensure professional responsibility and accountability.

The Nova Scotia College of Pharmacists is of the position that the proposed amendments to the *Pharmacy Act* will support the government's strategic priorities to improve public access to healthcare services and reduce wait times and will enable pharmacists to more fully utilize their skills and competencies in the interest of the health and well-being of Nova Scotians.