

Consultation on improving access to drugs and other health products in Canada

The impact of drug shortages in collaborative practice settings

Canadian Society of
Hospital Pharmacists



Société canadienne des
pharmaciens d'hôpitaux

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The Canadian Society of Hospital Pharmacists (CSHP) is the national organization of pharmacists committed to supporting pharmacy practice and medication safety in collaborative healthcare settings. The impact of drug shortages in hospital and ambulatory practice settings is significant since parenteral drug therapies are more challenging to develop, procure, compound, and administer. Patients are at increased risk as these drug shortages require mitigation strategies forcing the adaptation of treatment algorithms to less effective and often riskier alternatives. Each hospital and clinic must redesign its workflow to switch to new protocols for preparation, administration, and monitoring. Not only can treatments be delayed but the ability to perform medical procedures and surgeries can be impeded due to lack of drug availability. Ultimately, this costs the health care system more money due to off-contract purchases, switching protocols, and administrative costs of mitigation strategies (which often include policy changes such as restrictions, therapeutic substitutions, and ethical frameworks for prioritization of patients). It is also inefficient for the healthcare system as a whole as each hospital and health system across the country adopts individual approaches and mitigation strategies.

CSHP applauds Health Canada's approach to engaging key partners in the drug shortage process. The Multistakeholder Calls, Tier Assignment Committee, Drug Shortage task force and roundtables have all been important steps to support the management of drug shortages. The four pillars of improved communication/transparency, maintaining an agile regulatory toolbox, greater supply chain visibility and enhanced response to supply and demand will anchor the key strategy to support.

CSHP would support the continued efforts on the collection, analysis, and sharing of information related to upcoming, ongoing, and resolved shortages. Health Canada has developed an approach for ongoing notification and communication of drug shortages in collaboration with key partners and ensures efforts across the system are coordinated, harmonized, and transparent. Health Canada has been actively engaging key partners and identifying opportunities for improvement in the distribution of healthcare supplies during a shortage.

CSHP makes the following recommendations:

Improved communication and transparency



- Develop a system to enhance the early identification of impending drug shortages
- Develop a formal notification system for patient advocate organizations
- Improve the Tier Assignment Committee process with quicker turnaround to initiate the meeting and disseminate information
- Create a strategic national approach on stockpiling of critical medicines that involves:
 - Creating a finalized, harmonized list of medicines necessary to respond to potential national-scale public health emergencies, and an essential medicines list as well as drugs that have vulnerable supply chains.
- Develop a standardized process for conducting and sharing reviews and lessons learned. By reviewing previous cases, improve efficiency, increase understanding of causes, and identify new strategies or approaches to prevent and mitigate drug shortages.

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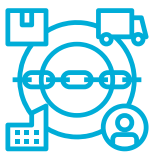
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Maintaining an agile regulatory toolbox



- Trigger the Tier Assignment Committee process sooner so the runway for foreign implementation is explored sooner and turnaround is quicker
- Expedite the process to move drugs to the Canadian market by introducing flexibilities in regulatory requirements particularly during critical Tier 3 drug shortages
- Offer incentives to bring novel therapies such as antibiotics or chemotherapy to existing drugs to the Canadian market
- Reassess of outsourced drug preparation (previously known as commercial compounding) legislation to inform where compounding by pharmacies can support shortages

Greater supply chain visibility



- Improve the process of early identification of supply disruptions from manufacturers
- Implement a national barcoding standards to enable technology to adequately 'track and trace' real-time inventory capture in institutional settings
- Improve tracking of inventory volumes throughout the supply chain gap from manufacturers, distributors through to clinics/hospitals. Currently, there is limited visibility to inventory levels at the distributor level. Hospital pharmacies have created manual processes to share, track and redistribute their inventory volumes across the province to ensure equity.
- Develop greater transparency in the allocation process during a critical shortage. Allocations of drugs tend to favour hospitals and clinics with higher purchasing volumes so pharmacists and other supply chain staff are left to manage and redistribute supplies to ensure drugs are meeting the patient needs.

Enhanced response to supply and demand



- Improved barcoding standards throughout the supply chain to better enable real-time tracking technology
- Improve transparency of the allocation process during a shortage and involve hospital pharmacists to support provincial infrastructure for distribution and tracking
- Implementation of a harmonized pharmacare system so that access to drugs is consistent across provinces and drug coverage is not a barrier to managing drug shortages

Conclusion

Health Canada has played a key leadership role in bringing stakeholders together to manage drug shortages and ensure that Canadians can access the drugs they need when they need them. As we consider the unique challenges faced by hospital and clinic practices, we want to reiterate that each shortage needs to be managed with an ethical framework that prioritizes patients for the limited supply available.

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