



Canadian Society of Hospital Pharmacists Société canadienne des pharmaciens d'hôpitaux

Mission

Committed to the advancement of patient-centred pharmacy practice in hospitals and related health care settings

Engagés à avancer la pratique pharmaceutique axée sur le malade dans les établissements de santé

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The Canadian Journal of Hospital Pharmacy

Le Journal canadien de la pharmacie hospitalière

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Canadian Hospital Pharmacy Residency Board

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April 27, 2004

Suzanne Gay  
Policy and Regulatory Affairs Division  
Office of Controlled Substances  
3503D, 123 Slater Street  
Ottawa, Ontario K1A 1B9

Dear Ms. Gay:

Re: Proposal to expand the authority to prescribe controlled substances

I am writing on behalf of the Canadian Society of Hospital Pharmacists (CSHP) in response to the above noted proposal. Representing over 2000 pharmacists, CSHP is the national voluntary organization of pharmacists committed to the advancement of patient-centred pharmacy practice in hospitals and related health care settings. CSHP members have a long standing reputation for innovative leadership in advancing pharmacy practice and in working collaboratively to improve medication use and patient outcomes.

Firstly, we would like to commend the Drug Strategy and Controlled Substances Programme (DSCSP) for initiating this review. This proposal is very much in line with recent federal and provincial health care reports which have consistently identified the need to review and realign responsibilities to optimize the roles of all health care providers within our current health environment. CSHP is very supportive of expanding the authority to prescribe controlled substances to other appropriate health care providers, as this will ultimately result in enhanced care for patients who require these therapeutic agents.

In response to your notice, CSHP submits the following preliminary comments for your consideration:

1. Patient safety and provision of the most effective therapy with these therapeutic agents, by the most appropriate professionals, should be fundamental considerations during these deliberations.
  - The authority to prescribe controlled substances should only be granted to health care providers who are regulated in their provinces through appropriate mechanisms.
  - We believe there is much to gain by ongoing collaboration between DSCSP and provincial regulatory and government bodies who grant prescriptive authority to appropriate disciplines within their jurisdiction. As an example, part of the provincial process for adding prescriptive authority to a particular health discipline's scope of practice could include an assessment of the risk versus benefits of also allowing them to prescribe controlled substances.

2. Pharmacists should be included in the group of health disciplines who are granted the authority to prescribe controlled substances.
  - Pharmacists receive more education and training about drugs and drug therapy than any other group of health care providers who are authorized to prescribe.<sup>(1)</sup>
  - Hospital pharmacists are essential members of multidisciplinary teams which provide care to many patient groups, including those that require treatment with controlled substances (eg. pain clinics, palliative care). Within these teams, pharmacists are recognized as the drug experts, and are routinely called upon to make recommendations related to appropriate drug therapy. In many situations, these pharmacists play a significant role in the prescribing of controlled substances, e.g. palliative care units where pharmacists are authorized to adjust doses and determine appropriate narcotic conversions. Physicians authorize the pharmacist to perform these prescribing activities on their behalf as they recognize the pharmacist's unique expertise in use of these agents.
  - Pharmacists have proven that they are very capable of assuming an increased role in prescribing drug therapies. A recent report by CSHP showed that a broad range of pharmacist-managed or collaborative drug therapy programs have existed in Canadian hospitals for several years.<sup>(2)</sup> Collaborative practice models utilizing pharmacists in a prescribing capacity have been shown to result in improved outcomes and better patient care.
  - In several provinces, pharmacists have already been granted the authority to prescribe certain drug therapies (eg. emergency contraception). In others, the right for pharmacists to prescribe is currently under consideration.<sup>(3,4)</sup>
3. CSHP wishes to be included in future consultations related to this topic. We would be most willing and interested in participating on the advisory group that will be established to assist in developing the policy and regulatory framework.
  - CSHP is recognized as the voice of hospital pharmacists in Canada. Hospital pharmacists have initiated much of the published work to date, on pharmacists' collaborative roles in direct patient care, including those related to prescribing.
  - Pharmacists are the health care providers that are most knowledgeable about drugs and appropriate drug therapy.
  - CSHP members across the country continue to play critical roles in the development and implementation of drug-related policies at both the facility/regional level as well as at the provincial level.
  - Our members can offer much expertise and advice in deliberations related to these proposed changes.

Thank you for the opportunity to comment on this proposal. Please feel free to contact either myself, or Myrella Roy, our Executive Director in Ottawa, for further information. We look forward to the possibility of working with you and other key stakeholders in this important initiative.

Sincerely,

Donna Pipa, B.Sc.Pharm, FCSHP  
Chair,  
Government & Health Policy Planning Committee (GHPPC)  
Canadian Society of Hospital Pharmacists

cc: Dr. Myrella Roy, Executive Director, CSHP  
CSHP Executive

References:

1. Alberta College of Pharmacists. Comparison of the Education, Training, and Licensure of Drug Prescribers in Alberta with Pharmacists. Jan 2003; <http://www.altapharm.org/ims/client/upload/PP-2-072803.pdf>
2. Task Force on Pharmacist Prescribing, Canadian Society of Hospital Pharmacists. An Information Paper on Pharmacist Prescribing Within a Health Care Facility. Can J Hosp Pharm 2002;55:56-62. <http://www.cshp.ca/advocacy/Prescribing%20Info%20Paper.pdf>
3. Alberta College of Pharmacists. Pharmacists Prescribing: An International Overview. Oct, 2003; <http://www.altapharm.org/ims/client/upload/PharmacistsPrescribingInternationalOverview.pdf>
4. Bill 90: An Act to Amend the Professional Code and Other Legislative Provisions as Regards the Health Sector. Statutes of Québec 2002, chapter 33: Publications Québec, (Assented June 14, 2002) <http://publicationsduquebec.gouv.qc.ca/home.php>