



August 6, 2018

Re: CSHP Ontario Branch Response to Consultation – *Standards of Operations for Pharmacies in Ontario*

Dear colleagues at the Ontario College of Pharmacists:

The Canadian Society of Hospital Pharmacists (CSHP) is a national voluntary organization of pharmacists committed to patient care through the advancement of safe, effective medication use in hospitals and other collaborative healthcare settings.

Members of CSHP Ontario Branch (CSHP OB) have reviewed the revised *Standards of Operations for Pharmacies in Ontario* and the revised *Reference Guide for Ontario Pharmacies*, the following feedback was received and collated for your review and consideration:

- Can you provide more information on references that meet the “*Patient Counselling Guide*” requirement?
- CSHP OB strongly recommends that the **Hospital Pharmacy Administrator** be a Pharmacist who is a registered member of the College. As is required for all community pharmacies within Ontario, a Pharmacist must be assigned as the **Designated Manager** by “...the owner(s)...as responsible for managing the pharmacy.” This requirement should be extended to the operation of all hospital pharmacies such that a Pharmacist is required for oversight of the hospital pharmacy operations to ensure that the pharmacy is operating within the requirements and specified by all applicable federal and provincial legislation, and standards of practice.
- Within the “Management and Employee Relations” Standard there is the statement referring to “...adequate number of qualified and trained staff to maintain the accepted standards of practice...” - How will this be determined and enforced by the College?
- Furthermore, how does this standard affect hospitals where there are no members of the College overseeing medication management within the hospital? How will this standard be upheld in hospitals in this situation?
- The “Information Management” standard refers to the NAPRA National standards for pharmacy practice management systems. The current state of some hospital information systems, namely pharmacy information systems do not meet the **auditability and traceability** requirement described in the national standards. How does the College envision enforcing this standard when hospital electronic information systems are limited and any upgrades to said system are considered an enormous capital investment? Can the College provide explicit information on the expectations for pharmacies (in particular hospitals) with respect to meeting the auditability and traceability requirement within the limitations of current electronic health/pharmacy information systems?

Thank you for the opportunity to provide this feedback. Please contact me if you have any questions or would like CSHP OB to provide more information on this feedback.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Hollis".

Kathryn (Katie) Hollis, BScPhm, MHA, ACPR

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