



January 12, 2018

Nancy Lum-Wilson
Registrar & CEO
Ontario College of Pharmacists
483 Huron Street
Toronto, ON M5R 2R4

Re: Canadian Society of Hospital Pharmacists – Ontario Branch – Recommendation to Clarify and Communicate Requirements for Sterile Compounding Standards to be in place in Ontario Hospitals prior to January 1, 2019

Dear Ms. Lum-Wilson:

The Ontario Branch of the Canadian Society of Hospital Pharmacists (CSHP-OB) feels that the Ontario College of Pharmacists (OCP) should be commended for demonstrating an ongoing desire to improve hospital medication systems and practice in Ontario. The focus on continuous quality improvement that the OCP has taken is well aligned with the approach organizations are taking to improve patient outcomes and enhance practice. With such alignment there is an excellent opportunity for collaboration and success.

As we move forward together, CSHP-OB members have indicated a need for greater clarity regarding the expectations associated with the NAPRA Model Standards for Sterile Compounding. **CSHP-OB would recommend that the Ontario College of Pharmacists provide clarification and communication around the requirements and expectations associated with the NAPRA Model Standards for Sterile Compounding.** We would recommend that clarity be provided regarding expectations for this calendar year and expectations post January 1st 2019.

Our members have expressed significant concern, in particular, with meeting the facility related requirements of NAPRA standards prior to the January 1, 2019 deadline and the impact on operations and current care processes. There are concerns that a lack of clarity will lead to ill informed decisions being made and uncertainty which could, inadvertently, decrease in the quality of care being provided to patients. Our members have expressed a desire to better understand the evaluation process and the expectations of the OCP so that those hospitals that cannot be fully compliant with standards as of January 1, 2019 will be able to plan for continued patient care needs. It is believed that a better understanding of the expectations can lead to planned and thoughtful change which can mitigate patient care impacts.

In discussion with stakeholders, CSHP Ontario Branch has identified the new NAPRA standards have significant resource implications from the perspective of staffing, processes, and physical space requirements. Organizations evaluating their current status have encountered challenges in addressing these resource implications and have repeatedly been asking for clarity regarding the implications of partial or noncompliance. We believe clear, broad-based communication from the OCP will help support hospitals and their associated pharmacies as they continue to move towards improved compounding.

We thank the Ontario College of Pharmacists for their continued focus on enhancing patient safety and look forward to continuing to collaborate to enhance sterile compounding practice in Ontario hospitals. Please contact me if you would like to discuss our recommendation in more detail.

Respectfully submitted on behalf of CSHP-OB executive and council,

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

Katie Hollis
President, Canadian Society of Hospital Pharmacists – Ontario Branch
CC. Judy Chong, Ontario College of Pharmacists