



October 29, 2018

Re: CSHP Ontario Branch Response to Consultation – Ontario College of Pharmacists Draft Opioid Policy

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.

Thank you for providing CSHP OB the opportunity for providing feedback on the Opioid Policy. Members of CSHP Ontario Branch (CSHP OB) have reviewed the *Draft Opioid Policy*, the following feedback was received and collated for your review and consideration:

- In *Section B: Assessment*, consider the following additions (**bolded** and **underlined**):
 - *Appropriateness of medication as prescribed (i.e. reviewing dose, **route, frequency, indication, formulation, quantity, duration of therapy, previous opioid use**)*
 - *Monitoring plan parameters such as withdrawal symptoms, **compliance, sedation, respiratory rate and response to therapy (i.e. pain scale)***
- Give consideration to providing a statement on the expectation of pharmacy professionals working in hospitals with operating rooms where narcotics and controlled substances are administered by physicians and oversight of narcotics is difficult. The College of Physicians and Surgeons of Ontario (CPSO) does not require physicians to follow specific documentation practices when ordering, administering and accounting for narcotics. This creates barriers and challenges to pharmacy professionals working in hospitals when reconciling narcotic transactions within the operating rooms. A joint statement from both OCP and CPSO directing practice of both professions to ensure that narcotics are appropriately accounted for within operating rooms.

The policy addressed both clinical and technical aspects of opioid stewardship applicable to hospital and collaborative care settings. However, there is still much work to be done to ensure appropriate oversight of opioids within the hospital setting to protect our communities from opioids making it onto the streets and into hands where they don't belong, eliminate potential pathways for narcotic diversion within all healthcare settings and finally to protect our patients from the unnecessary adverse effects of opioids.

Sincerely,

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