



September 4, 2018

Re: Use of Date of Birth on Prescriptions – IPC Complaint n^o HC17-86

Dear Ms. Patricia North:

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.

It has come to the attention of the Ontario Branch of CSHP (CSHP OB) through discussion with the Ontario Pharmacists Association that the Information Privacy Commissioner (IPC) is proceeding to adjudicate on a complaint (HC17-86) regarding the inclusion of Date of Birth (DOB) on electronically-generated hospital prescriptions. CSHP OB has concerns with the potential ruling to remove DOB from prescriptions. In our opinion, every prescription requires documentation of two patient-identifiers for the following reasons:

The World Health Organization, Joint Commission International, Accreditation Canada are among the various national and international organizations that recommend the use of two patient identifiers as a strategy to mitigate the risk associated with misidentification and furthermore medication errors. Examples of patient specific identifiers include patient name, date of birth and health card number. Given that there is risk for cases with identical names and addresses, the date of birth is the most commonly used second patient-identifier as it is easier for individuals to recall their DOB and not their health card number.

Pharmacists are responsible for ensuring that each patient receive the correct medication, at the most appropriate dose and frequency based on their individual indications for use and characteristics (e.g.: renal function, drug interactions). Ensuring safe and appropriate medication management for each individual patient is heavily dependent on age. Common medication errors involve the medication dose which is dependent on patient age, among other factors. Removal of a patient's DOB from a prescription increases the risk for misidentification errors and furthermore medication errors.

Preventable medication errors contribute significant costs to the Canadian healthcare system. A ruling in the direction to remove DOB from electronically-generated prescriptions will introduce another opportunity for medication errors to our patients. CSHP OB ask that the principle of patient safety remain the focus during the adjudication of this complaint and factors compromising patient safety while receiving care across all sectors of the Ontario healthcare system are considered.

Please do not hesitate to contact me if you have any questions or would like to discuss this matter further with CSHP OB.

Sincerely,

Kathryn Hollis, B.Sc.Pharm, MHA, ACPR
President, CSHP Ontario Branch