

Notice from the Executive Officer:

Expanded Scope of Practice and Accuracy in Claim Submissions

The Executive Office would like to remind pharmacy staff that claim submissions and documentation of these records must be accurate and complete.

Key information in pharmacy software systems include the date of birth, health card numbers and prescriber information. This information is often relied upon by other health care professionals, patients and caregivers and is used for the purpose of ministry audit and quality assurance of professional programs.

The accuracy of patient (health card number and date of birth) and prescription information initiated at the pharmacy level is vital within the health care system. Any inaccurate entries can extend into other patient care settings in the following ways:

- Inaccurate entries of patient and prescription information into the Health Network System (HNS) will appear on the Drug Profile Viewer that is used by hospital emergency departments.
- The Narcotics Monitoring System provides Drug Utilization Review alerts to pharmacies based on the submissions of patient and prescriber information in relation to monitored drug dispensing.
- MedsCheck medication reviews are often shared with other health care professionals.
- A MedsCheck medication review record or a pharmacy patient profile may be shared within the Circle of Care and often under emergency situations.

Date of Birth: The ministry has received a number of HNS claim submissions with incorrect dates of birth for non-ODB recipients. Non-ODB recipient HNS claims for services such as MedsCheck and administration of publicly funded influenza vaccine, require input of the correct date of birth and the health card number as part of the claim submission.

Pharmacists are reminded that administration of publicly funded influenza vaccine by pharmacists to patients less than five years of age is not permitted under the Regulation to the *Pharmacy Act* that outlines the expanded scope requirements.

Duplicate Claims: The ministry has received a number of duplicate claim submissions that indicate a patient has received more than one dose of publicly funded influenza vaccine administered by a pharmacist. Pharmacies that have submitted more than one administration claim for publicly funded influenza vaccine through the HNS will see a claim recovery adjustment made by the ministry if they have not been reversed at the pharmacy level. This does not apply to recipients where it is recommended that two vaccines be administered; i.e., patients up to age nine who have not previously received influenza vaccine. The level of inaccuracies for claim submissions for the administration of publicly funded influenza vaccine may be considered for future approvals of pharmacy sites participating in the Universal Influenza Immunization Program (UIIP).

Please ensure that pharmacy software systems are not automatically submitting claims through automatic refill reminder programs for any HNS claim.

Approved pharmacy sites: Only pharmacies that have been approved to administer publicly funded influenza vaccine under the UIIP may submit claims for reimbursement. These are the pharmacies that have completed the User Agreement, have undergone a cold chain (refrigerator) inspection by their local public health unit and received approval to order and administer the publicly funded influenza vaccine at their pharmacy location by a trained pharmacist.

Prescriber Field: It is important to note that when extending, adapting or initiating a prescription, pharmacists become the prescriber of that medication and this must be recorded appropriately for the HNS claim that is submitted to the ministry.

The Executive Officer would like to remind pharmacists to include their pharmacist identification number in the prescriber field for the new authorities. This includes:

- prescribing under the expanded scope of practice,
- administering publicly funded influenza vaccine, and
- providing professional pharmacy services that require a claim submission through the HNS.

The prescriber field must include a pharmacist's identification for claim submissions for:

- **pharmacist prescription renewals**
- **pharmacist adapted prescriptions**
- **pharmacist initiated prescriptions for a smoking cessation drug**
- **a pharmacist administering publicly funded influenza vaccine**
- **a MedsCheck service**
- **the Pharmaceutical Opinion Program**
- **the Pharmacy Smoking Cessation Program**
- **the ColonCancerCheck screening program**

Limited Use: Pharmacists may prescribe Champix and Zyban and therefore can issue the Limited Use (LU) code as initiator of these therapies. It is important to note that for those LU products that have time-limited periods, there is typically a requirement for a patient assessment to ensure that the LU criteria are still being met. It is the expectation of the ministry that pharmacists will appropriately make the necessary assessment if they are extending a prescription and renewing the LU code. If pharmacists feel that performing the assessment is beyond their scope of practice, the patient must be referred to the original prescriber.

It is important to note that when extending a prescription, pharmacists become the prescriber of the medication and this must be recorded appropriately for the claim that is submitted. All renewals, adaptations and prescriptions initiated by pharmacists are subject to ministry audit and review.

In addition, under the expanded scope of practice, pharmacists may adapt a prescription based on the circumstances of the particular patient by altering the dose, dosage form, regimen, or route of administration to address the patient's unique needs and circumstances. This does not include therapeutic substitution nor does it include adding a Limited Use code if it was missing from a prescription issued by another prescriber.

Exceptional Access Program: Pharmacists may renew a prescription for drugs that are covered for funding under the Exceptional Access Program (EAP) provided the renewal is within the EAP authorization period. If the EAP authorization has expired, the EAP program requires an Ontario physician to apply or re-apply on behalf of the patient.

Facilitated Access Program: Should prescriptions require adapting or renewal under the Facilitated Access Program, pharmacists need to contact the prescriber for collaborative action on the prescription. At this time, pharmacists are not able to adapt or renew prescriptions under the Facilitated Access Program. Prescribers of Palliative Care and HIV drugs listed under the Facilitated Access Program are required to apply for that respective

prescribing status and be activated on the HNS. Currently pharmacists are not part of the approved prescriber list for these drugs.

Registered Pharmacy Students and Interns are subject to the terms, conditions and limitations of their respective scope of practice and may perform expanded scope activities under direct supervision of a pharmacist. For the purpose of claim submissions through the HNS, the supervising pharmacist is required to input his/her pharmacist identification number in the prescriber field when a service was conducted by a student or an intern. Supporting documentation will outline the role of the student or intern as appropriate. Please note that only pharmacists registered in Part A with the required training may administer publicly funded influenza vaccine.

Reminder: Pharmacists are reminded of the Notice from the Executive Officer dated September 24, 2012 regarding requirements for the Narcotic Monitoring System (NMS) including: for **every** submission to the NMS it **must** include the proper prescriber registration number issued by the College of which he or she is a member (i.e., license number), as well as the 2-character code to identify the licensing College (i.e. 01 for CPSO). Be advised that pharmacists who continue to make NMS submissions using the unknown prescriber mechanism (submitting 99999 for a prescriber registration number and/or 99 for the College identification number) may be found **in breach of their legal obligations under the *Narcotics Safety and Awareness Act, 2010* ('NSAA')**. In addition, an incorrect physician name entered in the pharmacy system due to a lapse by pharmacy staff in verifying the prescriber's registration number may result in a false double-doctoring record in the NMS which could directly affect patient care and/or patient – physician relationships.

For further inquiries, pharmacies may contact the Ontario Drug Benefit Help Desk at 1-800-668-6641