

# STANDARDS OF PRACTICE

## Prescribing by Pharmacists

March 2023

*(Revised October 2024)*

# 1. INTRODUCTION

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Standards of Practice are minimum standards that all registered pharmacy professionals are expected to meet. Regardless of position or practice environment, when a pharmacy professional performs a specific role, they must perform it to the level specified in the Standards of Practice and meet all of the standards associated with that role. These Standards describe the minimum expectations for pharmacists involved in prescribing to patients and are intended to promote consistency in the provision of this service to the people of this province.

# 2. REQUIREMENTS

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- a) In order to receive authorization to prescribe, **all pharmacy professionals** must first:
  - i) apply to the College of Pharmacy of Newfoundland and Labrador (CPNL) for authorization; and
  - ii) demonstrate completion of the required orientation program.
- b) Applications will be reviewed and, if approved, authorization will be issued to the pharmacist. Once authorized, pharmacists must:
  - i) maintain competence in areas related to prescribing. Professional development should be undertaken, as necessary, to develop and maintain knowledge and skills; and
  - ii) agree to prescribe only in accordance with the standards established by CPNL, and within the limits of their own competence.

# 3. LIMITATIONS

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- a) In accordance with the Controlled Drugs and Substances Act and its associated regulations, a pharmacist may not prescribe Narcotics, Controlled Drugs or Targeted Substances, including benzodiazepines, except as authorized pursuant to Health Canada's [subsection 56\(1\) class exemption for patients, practitioners and pharmacists prescribing and providing controlled substances in Canada](#).
- b) A pharmacist may not prescribe for an animal.
- c) A pharmacist may not prescribe for themselves.
- d) A pharmacist should not prescribe for a family member or someone of a "close personal or emotional relationship" unless there is no alternative. If a pharmacist prescribes in these circumstances, it should be appropriately documented.

- e) A pharmacist may not provide an interim supply, extend a prescription, make a therapeutic substitution, or adapt a prescription where the original prescription bears a specific indication otherwise.
- f) Pharmacists must limit their prescribing activities to those situations covered by these Standards of Practice, and within the limits of their own competence.

## 4. GENERAL STANDARDS

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When prescribing to patients, the pharmacist must ensure the following minimum general practice standards are met:

- a) *Physical Environment.* The environment in which prescribing take place must:
  - i) take patient privacy into account; and
  - ii) be clean, safe, and comfortably furnished for the patient.
- b) *Informed Consent.*
  - i) Informed consent should be obtained directly from the patient unless it is considered appropriate, and in the patient's best interests, to communicate with the patient's agent on their behalf.
  - ii) The pharmacist must provide the patient or the patient's agent with sufficient information specific to the circumstances to allow them to make informed decisions regarding the pharmacist prescribing. This should include but is not limited to information about:
    - the condition being treated;
    - the drug therapy being prescribed;
    - expected benefits and risks of the drug therapy;
    - expected reaction / response and related timeframe;
    - common and rare side effects;
    - monitoring and/or follow-up; and
    - details of planned communications within the patient's circle of care, as appropriate.
  - iii) To ensure understanding of the process and to ensure that suitable information has been provided, the pharmacist must provide the patient or their agent with an opportunity to ask questions and obtain responses about the pharmacist prescribing process.
- c) *Competency and the Code of Ethics.*

- i) Pharmacists must use their professional judgement to determine whether the specific circumstance of each instance of prescribing is within their scope of practice, competence, and experience.
- ii) Pharmacists shall not prescribe under conditions that compromise their judgement or integrity, nor impose such conditions on other pharmacists.
- iii) There is no obligation for a pharmacist to prescribe. A pharmacist shall not prescribe if there is insufficient information or concern about added risks to the patient. In these cases, the patient should be referred to their primary health care provider or another appropriate health care professional.
- iv) Prescribing decisions must be based on clinical suitability, cost-effectiveness and what is in the best interests of the patient. Prescribing decisions based on biased information or financial advantage may be regarded as constituting conduct deserving of sanction.
- v) When issuing a prescription to a patient, the pharmacist must advise the patient that they have the right to have the prescription filled at the pharmacy of their choosing. Refusing to prescribe to a patient who wishes to have the prescription filled elsewhere or refusing to fill a prescription issued by another pharmacist (unless there is a clinically sound rationale) may be regarded as constituting conduct deserving of sanction.

d) *Assessment to Determine Appropriateness for the Patient.*

- i) Prior to prescribing for a patient, the pharmacist must conduct and document a patient assessment appropriate to the circumstances, using a combination of patient interview, review of the patient's electronic health record, and other sources, as appropriate. This can include, but is not limited to, the patient's:
  - demographic information;
  - physical characteristics and/or measurements (height, weight, etc.);
  - presenting ailment/condition/disease/symptoms including any previous history and/or assessments, investigations, or treatments for the same;
  - relevant laboratory and/or diagnostic test results;
  - medical history including immunization history;
  - current medical conditions, medications, non-medication therapies, use of health care products/devices and treatments;
  - allergies and intolerances;
  - pregnancy and lactation status;
  - risk factors,; as well as
  - any other personal circumstances, practical needs, values, preferences, or other information relevant to the assessment.

- ii) Once this assessment has been completed, the pharmacist should use the information gathered to determine whether or not prescribing the drug therapy is appropriate for the specific patient under the specific circumstances. The pharmacist's decision should be in the best interests of the patient and not knowingly put the patient at increased risk. When making this decision, it may be helpful to consider the following questions:
    - Could I provide a reasonable rationale for the prescribing decision, if asked?
    - In general, would another pharmacist likely make the same decision, given the same circumstances?
  - iii) The pharmacist must be satisfied that the drug therapy being prescribed is for an intended use that reflects an indication approved by Health Canada or is widely accepted as best practice in Canada and supported by clinical evidence.
  - iv) As stated previously, there is no obligation for a pharmacist to prescribe. A pharmacist must not prescribe if there is insufficient information or concern about added risks to the patient. In these cases, the patient should be referred to their primary health care provider or another appropriate health care professional.
- e) *Monitoring and Follow-Up.* Pharmacists must use professional judgement to create and document a follow-up plan appropriate to the circumstances and the patient's needs.
- f) *Documentation.* Documentation methods (e.g., electronic or paper-based) should be determined based on professional judgement and collaboration with the pharmacy team.
- i) Whichever method is chosen, documentation must be completed in such a way, and provide sufficient detail, to allow others accessing the information to have a clear understanding of the prescribing activities, the pharmacist's rationale for their decisions, and the related follow-up plan.
  - ii) Documentation should also take place in situations where a pharmacist has completed an assessment but decided to refer the patient to their primary health care provider or other appropriate health care professional, rather than prescribe.
  - iii) Effective documentation includes details related to:
    - the patient assessment (as described in section 4.d i));
    - the pharmacist's prescribing decision and rationale, including the details of what was prescribed, or the reasons why a decision was made to not prescribe;
    - instructions given to the patient; and
    - follow-up plans, or other information to allow for continuity of care, and the results of the follow-up, if applicable.
  - iv) Patients should also be provided with suitable documentation for their records or to share with other health professionals in their circle of care.

g) *Communicate within the circle of care.*

- i) Sharing information related to prescribing activities enhances the opportunity for collaboration with other health care professionals in the patient's circle of care and supports the principles of patient safety and continuity of care.
- ii) Pharmacists are expected to communicate information about the prescription to the patient's primary health care provider and the original prescriber, if different. This notification may be achieved using:
  - the provincial electronic health record;
  - an appropriate regional health authority-approved patient care record (in hospital practice situations where it is not possible to document in the provincial electronic health record); or
  - another method determined in collaboration with the primary health care provider.
- iii) Pharmacists should also use professional judgement to identify situations where it is appropriate to communicate with other health professionals within the patient's circle of care.

## 5. CATEGORIES OF PRESCRIBING

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In addition to the General Standards outlined in section 4., the following standards specific to the individual categories of prescribing must also be met:

### 5.1 Prescribing Schedule I, II, III or Unscheduled Drugs for Approved Ailments or Conditions

a) *Appropriateness.* The pharmacist must be reasonably satisfied that:

- i) the drug is being prescribed to treat an ailment or condition listed in Appendix A; and
- ii) the prescription is in the best interests of the patient and will not put the patient at increased risk.

### 5.2 Prescribing Schedule I, II, III or Unscheduled Drugs for a Preventable Disease

a) *Appropriateness.* The pharmacist must be reasonably satisfied that:

- i) the drug is being prescribed to prevent a disease listed in Appendix B; and
- ii) the prescription is in the best interests of the patient and will not put the patient at increased risk. Consideration should be given to the patient's immunization history and information from the Public Health Agency of Canada. Patients should also be advised if the vaccine is available through the public health system as part of the provincial immunization schedules.

### 5.3 Prescribing Hormonal Contraceptives

- a) *Quantity*. The amount of medication provided shall be determined by the pharmacist based on the individual circumstances of the patient but shall not exceed the equivalent of a 90 days' supply if a patient has not previously been prescribed hormonal contraception or if a change in therapy is being prescribed. If well tolerated, refills for ongoing therapy may be prescribed.
- b) *Dosage Forms*. Pharmacists may prescribe oral formulations, patches, medroxyprogesterone acetate depot injection, and vaginal rings.
- c) *Appropriateness*. The pharmacist must be reasonably satisfied that the prescription is in the best interests of the patient and will not put the patient at increased risk.

### 5.4 Prescribing Schedule II, III or Unscheduled Drugs for Other Purposes

- a) *Appropriateness*. The pharmacist must be reasonably satisfied that the prescription is in the best interests of the patient and will not put the patient at increased risk.

### 5.5 Prescribing an Interim Supply

- a) *Quantity*. The interim supply should be for the minimum amount of drug required for the patient to visit their primary health care provider or their usual pharmacy.
- b) *Appropriateness*. The pharmacist must be reasonably satisfied that:
  - i) the patient has an established, stable, compliant history with the medication;
  - ii) the patient is unable to visit their primary health care provider or their usual pharmacy, or for a prescription transfer to be obtained in a timely manner;
  - iii) there is an immediate need for the medication; and
  - iv) the patient would not be better served by extending the prescription.

### 5.6 Extending a Prescription

- a) *Duration*. A pharmacist may not extend a prescription for more than 12 months beyond the date on which an extension was first written.
- b) *Quantity*. The amount of medication provided shall be determined by the pharmacist based on the individual circumstances of the patient but shall not exceed 90 days' supply.
- c) *Appropriateness*. The pharmacist must be reasonably satisfied that:
  - i) the patient has an established, stable, compliant history with the medication;
  - ii) the patient is unable to visit their primary health care provider in a timely manner; and
  - iii) there is a need for an amount of medication beyond an "Interim Supply".

## 5.7 Adapting a Prescription

- a) *Categories of Adaptation.* Pharmacists may adapt prescriptions to modify the brand, dose, duration, formulation, and/or regimen of the prescribed drug where:
- i) the prescribed brand, dose or formulation are not commercially available;
  - ii) the dose, strength, formulation, regimen, or duration of therapy are missing from the prescription and sufficient information is available or can be obtained from the patient, patient record and/or other sources to support the adaptation;
  - iii) a patient-specific factor (such as age, weight, organ function, medical condition, adverse drug reaction, concomitant medication) requires that the dose be adjusted;
  - iv) an adjustment in the formulation or regimen will enhance the patient's adherence or response to the medication; or
  - v) the adaptation will otherwise benefit the patient's individual needs and circumstances.
- b) *Appropriateness.* The pharmacist must be reasonably satisfied that:
- i) the adapted prescription will maintain or enhance the medication's effectiveness and/or improve adherence; and
  - ii) the adaptation is in the best interests of the patient and will not put the patient at increased risk.

## 5.8 Making a Therapeutic Substitution

- a) *Appropriateness.* The pharmacist must be reasonably satisfied that:
- i) the substituted drug will have a similar therapeutic effect as the prescribed drug; and
  - ii) the substitution is in the best interests of the patient and will not put the patient at increased risk.

## 5.9 Prescribing Post-Exposure Prophylaxis

- a) A pharmacist may only prescribe post-exposure prophylaxis upon the referral of a regional medical officer of health<sup>1</sup> or their designate.

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<sup>1</sup> "regional medical officer of health" means a person appointed under section 11. of the [Public Health Protection and Promotion Act](#).



# APPENDIX A

## Approved Ailments and Conditions

Pharmacists may prescribe for the following ailments and conditions:

- Acne, mild
- Allergic Rhinitis
- Aphthous Ulcers
- Atopic Dermatitis, mild-moderate
- Callouses and Corns
- Conjunctivitis
- Contact Dermatitis
- COVID-19
- Dandruff and Seborrhea
- Diarrhea (non-infectious)
- Dry Eye
- Dysmenorrhea
- Dyspepsia
- Emergency Contraception
- Fungal Nail Infections
- Fungal Skin Infections (including Athlete's Foot)
- Gastroesophageal Reflux Disease
- Headache, mild
- Hemorrhoids
- Herpes Simplex (cold sores)
- Herpes Zoster (shingles)
- Impetigo
- Insomnia, mild
- Joint Pain, mild
- Musculoskeletal Pain, mild
- Nausea and Vomiting
- Nicotine Dependence
- Oral Candidiasis
- Pinworms
- Upper Respiratory Conditions, mild (cough, nasal congestion, sore throat)
- Urinary Tract Infections, uncomplicated
- Urticaria, mild (including bites and stings)
- Vaginal Candidiasis
- Viral Skin Infections (common and flat warts)

## APPENDIX B

### Approved Preventable Diseases

Pharmacists may prescribe for the following diseases:

- Cholera (oral, inactivated vaccine for traveller's diarrhea prophylaxis)
- COVID-19
- Diphtheria
- Haemophilus Influenzae Type B
- Hepatitis A
- Hepatitis B
- Herpes Zoster (shingles)
- Human Papillomavirus (HPV)
- Influenza
- Measles
- Meningococcus
- Mumps
- Pertussis
- Pneumococcus
- Poliomyelitis
- Respiratory Syncytial Virus (RSV)
- Rotavirus
- Rubella
- Tetanus
- Varicella Zoster (chicken pox)