

August 14, 2008

Annie Schiefer, Project Manager
Health Professions Regulatory Advisory Council
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via email: HPRACSubmissions@ontario.ca

Dear Ms Schiefer:

I have practiced pharmacy in Ontario since 1991, when I was first licensed. I am pleased to be given an opportunity to provide input to your council on the Pharmacist Scope of Practice.

I am sending my support of OCP and OPA's recommendations for an expanded scope of practice and increased collaboration between pharmacists and other health care professionals involved in a patient's care. I am confident that these changes as proposed will result in superior and more efficient patient care for Ontarians. This is a much needed change and one that patients need and support.

In the following three paragraphs, I note scope of practice changes that would be of special importance in my practice:

My ability to perform to my full potential is limited by regulations that have not kept up with the pharmacist's expanding role in patient care and education. For example, as part of current practice, patients and caregivers expect me to pierce a patient's finger to demonstrate how to use a lancing device for chronic care monitoring, administer medication such as insulin to demonstrate proper technique, and administer medication when teaching patients how to use inhalers.

Pharmacists should be able to refill chronic medications defined under a set protocol; refill a patient's chronic medication on a one-time basis if the original prescriber is not available; order and receive laboratory tests, as needed, under a defined set of protocols; monitor and adjust doses of chronic medications under a prescribed protocol; adapt a prescription; initiate therapy for minor ailments from a set formulary; initiate therapy for travel prophylaxis and immunizations when needed and assess, initiate and monitor the most appropriate therapeutic approach for smoking cessation.

Pharmacists should be able to inject patients with medications and vaccinations. This is of particular note to me because I was a Certified Diabetes Educator (CDE) at one point in my career and was very frustrated that I could not demonstrate or effectively teach patients on the use of lancets, lancing devices, insulin injections, etc. due to scope of practice restrictions. If the Certified Diabetes Educator Certification Board (CDECB) can recognize pharmacists as eligible for certification along side nurses and physicians, I think it is reasonable that pharmacists be granted the scope of practice to inject patients.

I look forward to the results of your deliberations.

Sincerely,
Lisa Heath, BSc Phm
OCP # [REDACTED]