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Subject: Pharmacy Scope of Practice Review

Dear Ms. Schiefer:

Please accept this letter as commentary on the pharmacy scope of practice review submission. As dietitians, we are members of a regulated health profession with the same goal of offering effective, appropriate and timely patient-centred care to individuals/groups who are frequently under the care of many other health care professionals. We strive for simplicity, not complexity, and our approach with other health care providers is collaborative and should not be competitive – this is not in the best interest of our patients or clients.

In reviewing the pharmacy submission, it is apparent that the same collaborative, comprehensive approach is paramount to pharmacists. Many of us have worked in settings where this approach has allowed excellence in patient care, often better care than can be offered by each discipline working independently. The success of such approaches is in consistent, reliable information exchange between professionals and then with patients, using evidence-based practice and knowledge, and where the individual regulated health professional works within their scope of practice. This results in safe, competent care for our patients and the public.

Within the document, page 32 outlines wellness clinics that are becoming common events within pharmacies. There are many well-accepted, peer reviewed education tools available on the topics of heart health, osteoporosis and cancer prevention, to name just a few, which could be used for general information for the public by pharmacists in these settings. With the additional support of a registered dietitian to convey individualized nutrition assessment and counselling, the success of these clinics would only benefit the public and build in the clinics' success. However, the provision of nutritional therapy specific to an individual with a medical concern would not be in his/her best interest if supported solely by a pharmacist. The specialized training of a dietitian in clinical nutritional sciences is the optimal resource for individuals, supported by a developed body of knowledge obtained by registered dietitians through education, practice and evaluation. This type of event is an example

of an opportunity for collaboration in a primary care setting, spearheaded by the pharmacists.

In terms of enteral and parenteral nutrition support, the pharmacist again plays an important role in the preparation and dispensing of parenteral formula, identifying potential for drug nutrient interactions, and assisting in the community with access to these products. Pharmacists partner well with dietitians in both clinical and community settings in the realm of nutrition support, with acknowledgement of each discipline's specific bodies of knowledge and expertise. As noted on page 18 under controlled acts and the pharmacists' medication therapy management role, it is understood that pharmacists are not attempting to assume the role for nutrition assessment and prescription, and would not alter an enteral/parenteral formula as part of this scope of practice. Consultation with a dietitian would be of benefit to a patient requiring a prescription adjustment.

In summary, the opportunity to provide this feedback is valued and can only lead to enhanced and coordinated care for individuals and the public at large. As dietitians, we too strive for the best care possible for our clients. The need for timely care, closer to home is essential, and this scope of practice review process is one way to achieve this goal and take us one step closer to excellence in a collaboration of health care for all. Thank you for this opportunity to contribute, and we look forward to the outcome of the review process.

Sincerely,

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