

August 14, 2008

Health Professions Regulatory Advisory Council
55 St. Clair Avenue West
Suite 806, Box 18
Toronto, Ontario, Canada M4V 2Y7

Annie Schiefer, Project Manager

I am responding to the submissions by the Ontario College of Pharmacists (OCP) and the Ontario Pharmacists Association (OPA) with regard to the "Scope of Practice for Pharmacy" on behalf of Medical Pharmacies Group Inc.

Medical Pharmacies operates 36 pharmacies across Ontario. The majority of our pharmacies are located in Medical Clinics and our pharmacists are closely linked with the doctors in these buildings. We also have a number of pharmacies that specialize in provision of medication services to Long Term Care Facilities. We employ approximately 200 pharmacists and because of our focus on Long Term Care this includes a team of Consultant Pharmacists, whose primary location of practice is within the facilities, ensuring safe and appropriate medication administration for the residents.

It is my opinion, that the change to the "Scope of Practice" recommended by OCP appropriately reflects the practice of pharmacists in our environment today. The changes that are requested to our scope include tasks that are currently being performed by a number of pharmacists either through delegation, medical directive or by their own initiative with a subsequent request that the medical practitioner "signs off" on the actions that they have taken. Clearly, having these acts within the defined scope of practice of pharmacy will allow guidelines to be put in place to ensure that the service is provided consistently and uniformly to the residents of Ontario and the responsibility and accountability of the pharmacist will be clarified.

These changes in scope of practice will allow health care professionals to use their expertise appropriately. The pharmacist, who has the extensive knowledge of medications and how they work in the body, should be in the best position to make decisions around correct dosage forms, changes in dosage, dosage regimens and appropriate therapy. This would allow the patient who is relatively stable on their medications to be looked after by the pharmacist and allow more time for the physician to look after those patients who have more acute needs.

The OPA in addition to supporting the changes highlighted in the Scope of Practice Submission by OCP specifically requests the ability to order and receive laboratory tests, initiate therapy for travel prophylaxis and facilitate and administer immunization and other injectable drugs. In order for the pharmacist to appropriately monitor and adjust dosages it would be imperative for them to be able to access laboratory tests, and would streamline the process if they were also able to order the tests from the laboratory subject to accepted protocols. Immunization or administration of injectable drugs and well as initiating therapy for travel prophylaxis is a less prevalent practice among pharmacists at present; however, both are within the areas of expertise of the pharmacist and could be assimilated into their practice with additional education in these specialties.



We, at Medical Pharmacies fully support the submission of both the Ontario College of Pharmacists and the Ontario Pharmacists Association and are excited about the opportunities that the increased scope of practice will offer to our pharmacists allowing them to optimize their level of patient care and their satisfaction with their profession.

Respectfully submitted by:

A handwritten signature in black ink that reads "Elaine J. Akers". The signature is written in a cursive style with a large, flowing 'E' and 'A'.

Elaine J Akers, B.Sc.Pharm., R.Ph
V.P. Operations,

On behalf of:
Medical Pharmacies Group Inc