Practice Changes for Community Pharmacy During COVID-19 Pandemic

In addition to the Emergency Preparedness Tools that already exist to address any disruptions to patient care, the following exemptions have been enacted by regulatory authorities to help pharmacy professionals address the additional challenges due to the COVID-19 pandemic.

It is important that pharmacy professionals understand these exemptions, including what authority permits their expanded scopes, and the terms and conditions that apply in practice.

SCPP works closely with other regulatory partners (e.g. CPSS, CRNS, CDSS), the provincial government (MoH) and federal government (Health Canada) as we respond to developing events. Should conflicting messaging arise, contact the SCPP to confirm which direction prevails for pharmacy professionals.

What exemptions are currently in place during the COVID-19 Pandemic?

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| Federal         | Health Canada (HC) Section 56 Exemption        | HC’s Section 56 Exemption permits pharmacists to extend, transfer, and accept verbal prescriptions from prescribers for drugs found in the schedules of the Controlled Drug & Substances Act (CDSA) (e.g. methadone, morphine, methylphenidate, clonazepam). While verbal prescriptions can be accepted according to the exemption and the temporary override to the PRP, they are not preferred. Written or e-prescribing is the preferred method. HC’s section 56 exemption does not authorize:  
• initiation of therapy;  
• pharmacy technicians, or pharmacy interns (extended/student) to do any of the above.  
SK’s Prescription Review Program (PRP) does not permit:  
• the transferring of drugs listed in the CDSA more than once.  
Also see SCPP Section 56 Exemption Communication, the Joint Statement on the Section 56 Exemption for CDSA Drugs, and amendment to the “PRP Written-Only Requirement” below. Timeframe:  
• In effect until Sept. 30, 2026, or as otherwise communicated by Health Canada. |

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| SK COVID-19 Immunization Delivery Plan  
(Minister’s Order under The Public Health Act, 1994 & The Pharmacy & Pharmacy Disciplines Act) & Ministry of Health (MoH) - Drug Plan & Extended Benefits Branch (DPEBB) | COVID-19 Immunization Program (CIP) – COVID-19 Immunizers | Some COVID-19 Immunizers are enabled as part of their regular scope, and other COVID-19 Immunizers (pharmacy and non-pharmacy disciplines) are enabled through emergency provisions (see Ministerial Order here). See SCPP’s COVID-19 Immunizers FAQs and the Ministry website for additional terms and conditions. Note: When hiring a non-pharmacy professional, employers must work with, or have the professional check with their regulatory body to confirm any additional measures required when working in a private practice setting. Timeframe:  
• In effect until March 31, 2023, as authorized in the “Minister’s Order Designating Additional Vaccine Providers for COVID-19 and Influenza Vaccine.” |
| SK Occupational Health & Safety Testing “Test to Protect” Program  
(The Medical Laboratory Licensing Regulations) & The Pharmacy & Pharmacy Disciplines Act | Federal/Provincial “Test to Protect” Program – Performing COVID-19 Rapid Antigen Tests for OH&S purposes and Registrar’s Enactment of Park M Section 4 | As part of an occupational health and safety measure, in the absence of a medical laboratory license, pharmacists and pharmacy assistants may perform COVID-19 Rapid Antigen Tests provided by the federal/provincial governments, for staff and eligible individuals so long as it is part of the federal or provincial testing strategy (i.e., the Test to Protect program). See SCPP’s Saskatchewan COVID-19 “Test to Protect” Program in Community Pharmacies. Timeframe:  
• This is in effect until Dec. 31, 2022, or as otherwise specified by the SCPP Registrar. |
| SK Influenza Immunization Program (IIP)  
(Minister’s Order under The Public Health Act) | Emergency-Enabled Influenza Immunizers | Like the CIP, emergency provisions have enabled pharmacy technicians, pharmacist interns (extended/ student), formerly licensed pharmacists and some non-pharmacy professionals to administer influenza vaccines as part of the IIP (see Ministerial Order here). |
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| The Pharmacy & Pharmacy Disciplines Act & Ministry of Health (MoH) – Drug Plan & Extended Benefits Branch (DPEBB) |                                               | See the COVID-19 Immunizers FAQ and the Ministry website for additional terms and conditions that apply to the IIP.  
|                                                                          |                                               | **Note:** The non-pharmacy professionals enabled to immunize for the IIP are the same as those enabled for the CIP.  
|                                                                          |                                               | When hiring a non-pharmacy professional, employers must work with, or have the professional check with their respective regulatory body to confirm any additional measures required when working in a private practice setting.  
|                                                                          |                                               | **Timeframe:**  
|                                                                          |                                               | The 2021-2022 Seasonal Influenza Immunization Program ended March 31, 2022.  
|                                                                          |                                               | However, authorization for emergency-enabled influenza immunizers has been extended to March 31, 2023.  
| Ministry of Health – Drug Plan & Extended Benefits Branch (DPEBB)        | Expired:                                      | For the 2021-22 season, pharmacists are permitted to obtain verbal informed consent as per the DPEBB Policy  
|                                                                          |                                              | Documentation MUST clearly indicate if informed consent was obtained verbally.  
|                                                                          | Expired:                                      | For the 2021-22 season, pharmacies may choose alternate locations to provide the publicly funded influenza vaccine. Please review communication from the Ministry of Health for appropriate alternate locations outside the pharmacy.  
| Joint (CPSS, CRNS, SCPN, CDSS)                                           | Amended in CPSS bylaw, exemption no longer needed. | The written-only PRP requirement in section 18.1 of the CPSS Regulatory Bylaws has been amended to coordinate with HC’s section 56 exemption. This allows prescribers to provide verbal orders for drugs listed in the PRP as a last resort if written or electronic options are not available.  
|                                                                          | Prescription Review Program (PRP) Written-only Requirement | See SCPP’s Section 56 Exemption Communication for further guidance.  