



Alberta  
College of  
Pharmacy



## **Standards of Practice for Virtual Care**

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# Purpose and scope

This document establishes standards for regulated members who provide professional services using virtual care from a licensed pharmacy, institution pharmacy, or other practice site located within Alberta. ACP does not regulate enabling technologies but instead regulates the practice of members and their use of the technology.

These standards do not

- a. relieve a regulated member from their obligation to meet the requirements of the
  - i. Standards of Practice for Pharmacists and Pharmacy Technicians (SPPPT),
  - ii. Standards for the Operation of Licensed Pharmacies,
  - iii. Standards of Practice Sexual abuse and sexual misconduct,
  - iv. Code of Ethics,
  - v. *Health Professions Act* (HPA),
  - vi. Schedule 7.1 of the *Government Organization Act* (GOA),
  - vii. *Pharmacy and Drug Act* (PDA),
  - viii. *Health Information Act*, and
  - ix. all other applicable legislation and privacy requirements,
- b. enable a regulated member to provide virtual care when in-person care is required by the SPPPT<sup>1</sup>; or
- c. permit a regulated member to provide a mail order pharmacy service<sup>2</sup>, as defined under the PDA, unless that mail order pharmacy service is provided from a licensed mail order pharmacy.

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<sup>1</sup> An in-person encounter is required by SPPPT 12.2, 13.2, and, in some circumstances, 14.2.

<sup>2</sup> A "pharmacy service" means the storing, compounding, dispensing or selling of drugs; and a "mail order pharmacy service" means a pharmacy service provided to or for a patient for which neither the patient nor the patient's agent attends at the community pharmacy to receive the service. See PDA ss1(1)(s.1) and (n.2).

# Background

The Alberta College of Pharmacy recognizes virtual care is an emerging way for pharmacists and pharmacy technicians to deliver care and allow patients increased access and choice in how and from whom they receive professional services. This is especially true for patients in remote and underserved areas, patients with health circumstances that prevent them from attending at a pharmacy for in-person care, patients in institutional settings, patients with limited psychosocial supports or economic means, and during a state of emergency such as a natural disaster or a public health emergency such as a pandemic.

In planning and providing for the care of a patient, pharmacists and pharmacy technicians must ensure they foster a mutually beneficial relationship with the patient. Important for this relationship between a regulated member and the patient is respecting the autonomy of the patient to choose from where and whom they receive professional services.

A patient's request to receive virtual care is one factor that pharmacists and pharmacy technicians must use to assess, on a case-by-case basis, whether the professional services required by the patient can safely, appropriately, and effectively be delivered by virtual means. Pharmacists and pharmacy technicians considering virtual care must work collaboratively with patients to understand the needs of the patient and determine if they are able to meet these needs using virtual care.

These standards balance the use of virtual care with the ACP's mandate to ensure it continues to govern the profession of pharmacy in a manner that protects and serves the public interest. Accordingly, these standards must emphasize that use of virtual care does not alter the ethical, professional, or legal obligations of regulated members to provide a high standard of professional services. More specifically, these standards

- broadly enable the use of virtual care by regulated members providing professional services that are not restricted activities;
- limit the authority of regulated members to use virtual care to provide restricted activities to instances where the regulated member determines virtual care
  - will optimize and complement the in-person care the regulated member usually provides to the patient; or
  - is required, based on the patient's unique circumstances that make it impractical or impossible for the patient to receive professional services in person; and
- clarify when the regulated member is required to practise under a mail order pharmacy licence in order to use virtual care to provide restricted activities that include mail order pharmacy services.

# Definitions

## In this Standard

- a. **enabling technology** means any technology that permits communication between individuals in different locations, including through teleconferencing, video conferencing, email, or other internet-hosted service or application;
- b. **in-person care** means the regulated member provides professional services to the patient from a licensed pharmacy, institution pharmacy, or other practice site located within Alberta;
- c. **Other practice site** means a practice site other than a licensed pharmacy or institution pharmacy, that a regulated member has identified to the ACP as their location of employment or place of business and where the regulated member provides professional services within their scope of practice and in a manner that is in accordance with the Standards of Practice for Pharmacists and Pharmacy Technicians;
- d. **restricted activity** means a restricted activity as defined in the Standards of Practice for Pharmacists and Pharmacy Technicians; and
- e. **virtual care** means any interaction between patients and regulated members that includes the provision of a professional service and occurs remotely using an enabling technology<sup>3</sup>.

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<sup>3</sup> Virtual care does not include patient contact using an enabling technology for non-care purposes.

## Appropriateness of virtual care when providing a professional service

1. A regulated member who provides virtual care must meet the requirements of all applicable legislation, standards, and guidelines for in-person care.
2. A regulated member must work collaboratively with the patient to exercise clinical and professional judgment in determining whether it is appropriate to provide virtual care to the patient.
3. In exercising clinical and professional judgment under Standard 2, a regulated member
  - a. must not provide virtual care
    - i. if the patient requests in-person care; or
    - ii. if in-person care is clinically indicated, including when the patient requires a physical assessment or an assessment that requires in-person patient observation;
  - b. must not be bound by policies and procedures of a proprietor that compel or incentivize virtual care;
  - c. may consider a request from the patient to receive virtual care; and
  - d. must only provide a restricted activity using virtual care if the regulated member
    - i. determines virtual care will optimize and complement the in-person care the patient regularly receives from the regulated member and the patient elects to receive virtual care after being provided with the option to receive in-person care; or
    - ii. assesses a patient who does not receive in-person care from the regulated member and determines that the patient's unique circumstances make in-person care impractical or impossible, including when the patient
      - A. is in a remote area where in-person care would not otherwise be available to the patient;
      - B. requires a restricted activity that is unique, customized, or difficult to obtain in person from any regulated member within a reasonable travel distance to their location;
      - C. requires a professional service they are unable to obtain through in-person care due to a declared state of emergency or public health emergency<sup>4</sup>;
      - D. is isolating or in quarantine due to a communicable disease or a public health order;
      - E. has socio-economic or health circumstances that prevent the patient from seeing a pharmacist or pharmacy technician of their choice in person; or
    - iii. determines that a patient who does not regularly receive in-person care from the regulated member is in a location that makes in-person care impractical or impossible, including when the patient
      - A. is in a correctional facility where in-person care is not readily available or accessible;
      - B. is in an approved hospital operating under the *Hospitals Act*;
      - C. is in a facility, diagnostic centre, secure location, or treatment centre as described in the *Mental Health Act* or the *Mental Health Services Protection Act*; or
      - D. is in a long-term care or designated supportive living setting.

<sup>4</sup> As declared by the federal, provincial, or a municipal government in accordance with respective legislation authorizing such action.

4. If a regulated member provides restricted activities under standard 3(d)(ii) and 3(d)(iii) from a community pharmacy that include the dispensing or selling of drugs, the regulated member must ensure the community pharmacy holds a mail order pharmacy licence<sup>5</sup>.
5. A regulated member must not ordinarily provide virtual care from outside of Alberta.
6. A regulated member must not provide virtual care to an individual located outside of Alberta, unless that individual is currently a patient of the regulated member and
  - a. ordinarily receives care in Alberta;
  - b. requires follow up or monitoring in relation to the care the patient ordinarily receives in Alberta; or
  - c. requires support to transition their existing care
    - i. to Alberta from another jurisdiction, or
    - ii. from Alberta to another jurisdiction.
7. A pharmacist who assesses patients virtually must consider the limitations of the enabling technology and evaluate if virtual care allows appropriate assessment of the patient and the pharmacist service to ensure the pharmacist can reasonably
  - a. access any information required to make an assessment,
  - b. complete a thorough assessment of the patient,
  - c. identify and take appropriate action for any drug therapy problems,
  - d. appropriately refer the patient to other healthcare providers if required, and
  - e. conduct follow up on the care they have provided.
8. A pharmacy technician who provides pharmacy technician services to patients virtually must consider the limitations of the enabling technology and evaluate if virtual care allows appropriate delivery of the pharmacy technician service to ensure the pharmacy technician can reasonably
  - a. access any information required to provide the pharmacy technician service;
  - b. gather and document information required to enable a clinical decision by a pharmacist;
  - c. provide information and education to the patient that does not require therapeutic knowledge or assessment;
  - d. appropriately refer the patient to the pharmacist for assessment, if required; and
  - e. conduct follow up on the care they have provided.

## **Establish a professional relationship with the patient and obtain consent**

9. Where authorized under this Standard to provide virtual care, a regulated member must ensure they establish and maintain a professional relationship with each patient for whom they provide virtual care.

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<sup>5</sup> In accordance with section 6.1 of the Pharmacy and Drug Regulation, pharmacists providing restricted activities under standard 3(d)(i) from a community pharmacy are not required to ensure the community pharmacy holds a mail order pharmacy licence so long as they regularly provide care to the patient in person.

10. Before providing virtual care to a patient, a regulated member must
  - a. confirm the patient understands and acknowledges the risks and limitations of virtual care,
  - b. obtain the informed consent of the patient to receive virtual care, and
  - c. assess the patient and ensure the patient has the ability and comfort with the enabling technology to receive effective virtual care.
11. Each time a regulated member provides virtual care to a patient the regulated member must
  - a. identify themselves to the patient by providing their name, practice location, and professional role, and be able to produce a copy of the regulated member's practice permit on request;
  - b. identify the patient;
  - c. confirm with the patient that the patient is in a physical setting that is appropriate and sufficiently private to receive virtual care;
  - d. ensure there is a plan in place to manage adverse events or emergencies and make the patient aware of appropriate steps to take if such adverse events or emergencies occur; and
  - e. ensure that the patient is aware how they may contact the regulated member to follow up.

## **Documentation**

12. In addition to the documentation required by the SPPPT, a regulated member who provides virtual care must document in the patient record
  - a. the informed consent of the patient to receive virtual care;
  - b. the time, date, and enabling technology used to provide virtual care in the patient's record; and
  - c. the requirements outlined in standard 11.

## **Access to records and patient confidentiality**

13. A regulated member must have access to patient records, including the provincial electronic health record to provide virtual care.
14. A regulated member who provides virtual care must
  - a. take reasonable steps to protect each patient's privacy, and the confidentiality of any information transmitted through an enabling technology; and
  - b. ensure that the enabling technology is functioning properly and maintains adequate connectivity to support the virtual care provided.
15. A regulated member must not make an audiovisual or other recording of a virtual care encounter.

## **Develop policy and procedure**

16. Before offering virtual care from a licensed pharmacy, a pharmacy licensee must develop policies and procedures that
  - a. ensure there is a clear and comprehensive written standard operating procedure for all enabling technologies used, and
  - b. provide a contingency plan for service interruptions.

17. A pharmacy licensee must put reasonable administrative, technical, and physical safeguards in place to protect the security and integrity of data and maintain the confidentiality of patient information and the privacy of the patient.
18. Before offering virtual care from an institution pharmacy or other practice site, a regulated member must satisfy themselves that
  - a. the institution pharmacy or other practice site has policies in place that meet the minimum requirements under standard 16 before providing virtual care; and
  - b. there are reasonable administrative, technical, and physical safeguards in place to protect the security and integrity of data and maintain the confidentiality of patient information and the privacy of the patient to meet the minimum requirements under standard 17 before providing virtual care to a patient.

## **Develop and maintain technological competence**

19. Before providing virtual care to patients, a regulated member must have the knowledge and skills required to operate the enabling technology to be used.

## **Ensure use of the enabling technology has been submitted to the Office of the Information and Privacy Commissioner (OIPC)**

20. A regulated member must not transmit health information using an enabling technology not included in the Privacy Impact Assessment (PIA) submitted to the OIPC by the pharmacy, institution pharmacy or other practice site where they practice.

## Legislation

- Alberta College of Pharmacy; Standards of Practice for Pharmacists and Pharmacy Technicians
- Alberta College of Pharmacy; Standards for the Operation of Licensed Pharmacies
- Alberta College of Pharmacy; Code of Ethics
- Government of Alberta; [Health Information Act](#)
- Government of Alberta; [Pharmacy and Drug Act](#)

## Privacy information

- Office of the Information and Privacy Commissioner; [Advisory for Communicating with Patients Electronically](#)
- Office of the Information and Privacy Commissioner; [Privacy Impact Assessments](#)