

Guidelines for the profession

Sale of epinephrine auto-injectors to an authorized individual from a school board under the *Protection of Students with Life-Threatening Allergies Act*

This document provides guidelines to pharmacists and pharmacy technicians on meeting their obligations under standard 1.24 of the “Standards of Practice for Pharmacists and Pharmacy Technicians” (SPPPT) when selling epinephrine auto-injectors to an individual authorized by a school board* under standard 1.24 (“authorized individual”).

Expectations for the use of these guidelines

These guidelines establish the professionally accepted means by which regulated members can achieve compliance with standard 1.24. These guidelines are not recommendations; they establish the expected conduct of regulated members.

Except as contemplated by standard 1.24 and these guidelines, pharmacists and pharmacy technicians involved in the sale of epinephrine auto-injectors to authorized individuals are expected to comply with the SPPPT and any other legislation respecting the sale of schedule 2 drugs. See Appendix A (below) for ease of reference to the generally applicable standards.

Guidelines

1. Before selling an epinephrine auto-injector to an authorized individual, the pharmacist or pharmacy technician must
 - Verify the identity of the authorized individual.
 - Confirm that the individual is authorized to purchase an epinephrine auto-injector by the school board for a specific school.
 - Consider appropriate information when selling epinephrine auto-injectors for a school under standard 1.24. As this information is not patient specific, the pharmacist is not required to focus on the patient specific elements of standard 3. Rather, the pharmacist must assess the needs of the school where the epinephrine auto-injectors will be maintained. The information considered must include
 - the number of epinephrine auto-injectors required by the school; and
 - the demographics of the students at the school, including the range of weights and ages of students to determine the type and strength of auto-injectors required.
2. A pharmacy technician who sells an epinephrine auto-injector to an authorized individual under standard 1.24 must ensure that a pharmacist has determined the purchase is appropriate under Guideline 1 above.
3. A pharmacist is not required to determine if a drug therapy problem is present or possible for a specific patient as required by standard 4 in relation to the sale of an epinephrine auto-injector to an authorized individual under standard 1.24.

*As defined within the *Protection of Students with Life-Threatening Allergies Act* (2019)

4. The pharmacist or pharmacy technician must ensure that a transaction record of the sale of the epinephrine auto-injectors is created and maintained by the licensed pharmacy. Since there is no specific patient named, the record must document that the sale was made for a school under standard 1.23. This record must also include
 - the name of the authorized individual to whom the epinephrine auto-injectors were sold,
 - the name of the school board to which the epinephrine auto-injectors were sold,
 - the name of the school where the epinephrine auto-injectors will be maintained,
 - the date the epinephrine auto-injectors were sold,
 - the name and strength of epinephrine auto-injectors,
 - the DIN of the epinephrine auto-injectors sold,
 - the number of epinephrine auto-injectors sold for the school,
 - a unique transaction number, and
 - the identity of the selling pharmacist.
5. When selling an epinephrine auto-injector to an authorized individual, pharmacists and pharmacy technicians must not access information about or upload information to the Electronic Health Record (Netcare) of the authorized individual.

Appendix A – Referenced Excerpts from SPPPT

Standard 1: Pharmacists and pharmacy technicians must act professionally.

Facilitating compliance with the Protection of Students with Life-Threatening Allergies Act

Standard 1.24 Subject to the directions of Council, a pharmacist or a pharmacy technician practising with the pharmacist may sell epinephrine auto-injectors to an individual authorized by a school board* to purchase epinephrine auto-injectors to be maintained in a school under the *Protection of Students with Life Threatening Allergies Act* despite the requirements in these standards respecting identification, assessment, communication, documentation and record keeping on a patient specific basis.

*As defined within the *Protection of Students with Life-Threatening Allergies Act* (2019)

Standard 3: Pharmacists must consider appropriate information for each patient.

Duty to consider appropriate information

Standard 3.1 A pharmacist must consider appropriate information to assess the patient and the patient's health history and history of drug therapy each time:

- a) the pharmacist:
 - i. prescribes a Schedule 1 drug or blood product;
 - ii. conducts a review of a patient's drug utilization; or
 - iii. provides advice to a patient about a drug, a blood product or drug therapy.
- b) the pharmacist or a pharmacy technician practising with the pharmacist:
 - i. dispenses a Schedule 1 drug or blood product under a new or a repeat prescription, or
 - ii. dispenses or sells a Schedule 2 drug

Standard 4: Pharmacists must determine whether a patient has or is likely to have a drug therapy problem.

Pharmacists' duty in relation to drug therapy problems

Standard 4.1 A pharmacist must consider whether a patient has a drug therapy problem or is likely to have a drug therapy problem, each time:

- a) the pharmacist:
 - i. prescribes a Schedule 1 drug or blood product;
 - ii. conducts a review of a patient's drug utilization; or
 - iii. provides advice to a patient about a drug, a blood product or drug therapy;
- b) the pharmacist or a pharmacy technician:
 - i. dispenses a Schedule 1 drug or blood product pursuant to a new or a refill prescription, or
 - ii. dispenses or sells a Schedule 2 drug

Standard 8 - Each time a pharmacist or a pharmacy technician dispenses a Schedule 1 drug or blood product pursuant to a prescription, or sells a Schedule 2 drug:

- a) the pharmacist or the pharmacy technician must confirm the patient's identity, and
- b) a pharmacist must provide the patient with sufficient information to enable the patient to receive the intended benefit of the drug therapy.

Standard 18: A pharmacist must create and maintain patient records for pharmacist services provided by that pharmacist. A pharmacy technician must create and maintain patient records for pharmacy technician services provided by that technician.

Duty to enter information in a patient's record

18.2 A pharmacist or a pharmacy technician who:

- a) dispenses a Schedule 1 drug or blood product;
 - b) sells a Schedule 2 drug; and
- a pharmacist who:
- c) prescribes a Schedule 1 drug or blood product;
 - d) administers a drug or blood product; or
 - e) establishes a follow-up plan or other patient care plan

must ensure that an appropriate entry is made in the patient's record.

Appendix A (from SPPPT)

Patient record requirements

Schedule 2 drugs sold

- a) The name of the patient for whom the drug was dispensed or sold
- b) The date the drug was sold
- c) The name, strength, and dosage form of the drug sold
- d) The DIN of the drug sold
- e) The quantity of the drug sold
- f) A unique prescription or transaction number
- g) Identification of the selling pharmacist