



Blake Reynolds, Chair  
College of Pharmacists of BC  
200 - 1765 West 8th Ave  
Vancouver, BC  
V6J 5C6

July 6, 2016

Dear Mr. Reynolds,

The BC College of Family Physicians (BCCFP) has reviewed with interest the *Certified Pharmacist Prescriber Draft Framework*. As a professional college we understand the importance of broad stakeholder engagement when considering changes with potential system wide impact. As a result, in addition to encouraging our members to participate in the online survey, we are writing directly to you to provide feedback regarding the proposed new authority for pharmacist prescribing.

As you are aware, the BC College of Family Physicians is the home of family medicine in British Columbia representing more than 4600 family physicians. We support family physicians to provide quality patient care, enhanced practice management and continuing professional development. We advocate for the Patient's Medical Home, a vision for patient-centred, team-based family medicine and primary care.

The vision for the Patient's Medical Home model includes ten pillars, or practice model goals; each supported by evidence that demonstrates enhancement of primary health care in BC. These key pillars include patient-centred, person focused, interprofessional team-based care offering patients timely access to continuous, comprehensive and coordinated care that meets individual patient and community health care needs.

It is in the context of this vision that we write regarding our concerns with the suggested introduction of pharmacist prescribing. It is unquestionable that the contributions and work of pharmacists within the health care team are crucial to safe patient care; however, it is not evident that the proposed framework supports and promotes team-based/ interdisciplinary care. In fact, the proposed framework seems to encourage more professional silos with greater opportunity for patients to get lost between providers.

Prescribing is a privilege with inherent responsibilities, to be considered only by taking the whole patient into account. The decision to prescribe any medication involves conducting a complete clinical assessment, which may include a physical examination and diagnostic investigations. In addition, management must respect patient values and beliefs and include non-pharmacologic options. The framework proposed by the CPBC does not clarify the competencies and the training requirements for pharmacists to conduct complete assessments or physical examinations.

The framework also does not outline a process of consultation or confidential communication with other care providers should the pharmacist identify an issue that falls outside of their scope of expertise. There is concern that the pharmacist would not have complete information as they will not have access to the patient's full medical record including specialist consultations. The seamless transition of patient care between providers is a significant challenge in the existing care system and there is concern that this new practice may exacerbate this patient safety issue.

It is unclear if the CPBC has considered the impact of this proposal on team-based care and the Primary Care Home models rolling out across the province, but has simply not clarified it within the framework and survey. There also remains a significant worry regarding the perceived conflict of interest of having pharmacists prescribe medications as they stand to benefit financially from prescribing privileges.

The BCCFP believes that looking at policies and scopes of practice is an important part of system quality improvement to address the issues of access and comprehensiveness. However, we believe that in order to be successful in our health care improvement efforts, we need improved collaboration. We hope that our feedback will be considered and reflected within the results of the stakeholder engagement report. We welcome further dialogue to help inform the final framework and move forward collaboratively to achieve efficient team-based care within the province.

Sincerely,



Christie Newton, MD, CCFP, FCFP  
President

cc: Dr. Ernie Chang, President Society of General Practitioners  
Mary Kjorven, Chair - College of Registered Nurses of BC  
Honourable Terry Lake, Minister of Health  
Dr. Alan Ruddiman, President Doctors of BC  
Dr. G.A. Vaughan, President - College of Physicians and Surgeons of British Columbia