

College of Pharmacists
of British Columbia

**PRACTICE
REVIEW
PROGRAM** 

*PHARMACY PRE-REVIEW
TUTORIAL*



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Goal of the Practice Review Program (PRP)

- To protect public safety by improving compliance with College Bylaws and Professional Practice Policies
- To increase awareness, understanding and compliance with all applicable legislation, standards, and College expectations as a regulated pharmacy professional and of a licensed pharmacy; and
- To ensure consistent delivery of pharmacy services across British Columbia by observing regulated pharmacy professionals in their own practice settings as they perform daily duties

The *Pharmacy Pre-Review* is

- The responsibility of the Pharmacy Manager to complete and submit
- A self-evaluation of the pharmacy and responsibilities of the Pharmacy Manager, Direct Owners, Directors and Officers which engages Pharmacy Managers and staff in a self-assessment of their practice and pharmacy
- A tool to identify the strengths and areas of improvement for the pharmacy so corrective changes (e.g. staffing, educational, physical, and professional practice changes) can be made prior to the *Pharmacy Review*
- Directly linked to the legislated requirements
 - Will have the same questions that the Compliance Officers (CO) will be evaluating during the *Pharmacy Review*;
 - If the pharmacy provides other optional services (such as Residential Care, Compounding), questions applicable to those services will be used at the *Pharmacy Review*; and
 - If there has been a change in requirements between the *Pre-Review* and the *Pharmacy Review*, the pharmacy will be reviewed using the current standards
- An educational tool that assists the Pharmacy Manager to prepare for the *Pharmacy Review*

Note: Please allow approximately 2 hours to complete the entire *Pharmacy Pre-Review*.

Get Staff Involved

- Prepare for the *Pharmacy Pre-Review* by reflecting on your practice in a systematic way; evaluate the way you and your staff work, and what outcomes you achieve when answering each question.

- **It is beneficial to have staff participate in the *Pharmacy Pre-Review***
 - Staff can assist to answer the *Pre-Review* questions by identifying the strengths and areas for improvement in the pharmacy

- **If staff do not participate**
 - It is recommended that the Pharmacy Manager share the completed *Pre-Review* before it is submitted to the College

Applicable Legislation and Standards

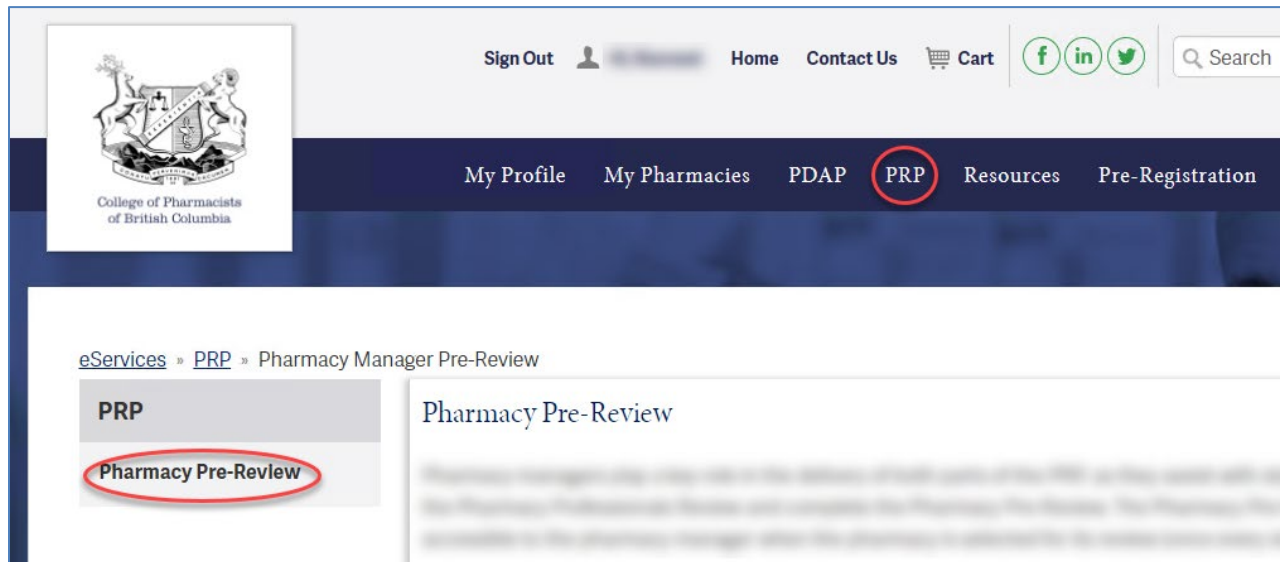
All of the *Pharmacy Pre-Review* questions are directly linked to the following legislation and standards:

(Click to link to legislation or standard)

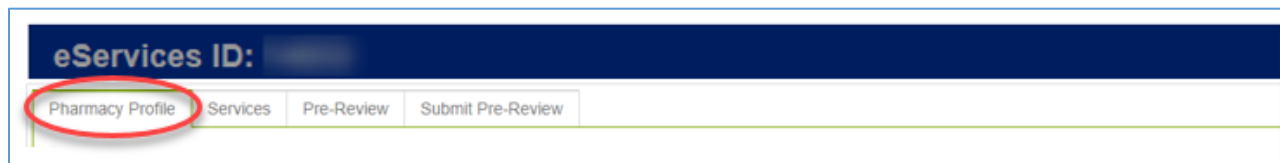
- **[Health Professions Act \(HPA\)](#)**
 - [Regulations and Bylaws](#)
- **[Pharmacy Operations and Drug Scheduling Act \(PODSA\)](#)**
 - [Regulations and Bylaws](#)
- **[Code of Ethics – HPA Bylaws - Schedule A](#)**
- **[Professional Practice Policies \(PPP\)](#)**
- **[Health Care \(Consent\) and Care Facility \(Admission\) Act](#)**
- **[Food & Drugs Act and Regulations](#)**

Pharmacy Pre-Review Instructions

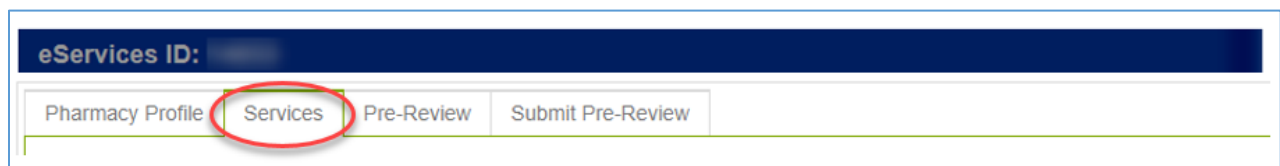
1. Use the link included in the selection email to access the *Pharmacy Pre-Review* through eServices. Alternatively, log into “eServices”, select the “PRP” tab and then “**Pharmacy Pre-Review**”. For security reasons, you will need to enter your eServices username and password again.



2. Click the “**Pharmacy Profile**” tab. Review the information and update if needed.



3. Click the “**Services**” tab. Review the information and update if needed.



4. Click the **“Pre-Review”** tab. Review the information and update if needed.



The screenshot shows a navigation bar with the text "eServices ID:" on the left. Below this, there are four tabs: "Pharmacy Profile", "Services", "Pre-Review", and "Submit Pre-Review". The "Pre-Review" tab is highlighted with a red circle, indicating it is the active tab.

Answer all the questions in each category and sub-tabs. Select your answer(s) based on the following:

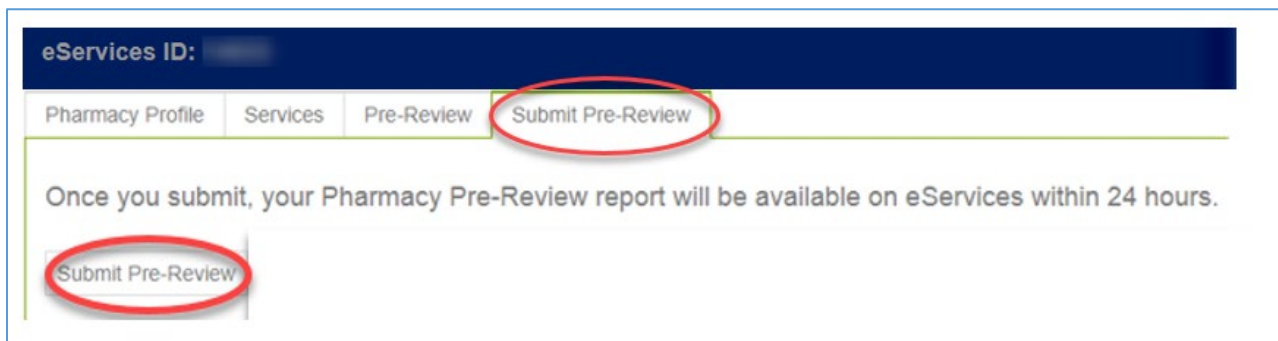
- Click the **“Compliant”** box if you/the pharmacy is compliant
- Do not click the **“Compliant”** box if you/the pharmacy is not compliant
- Do not click the **“Compliant”** box if the item does not apply to your practice or pharmacy

Note: All questions answered as **“not compliant”** require comments.

Use the following criteria to determine compliance:

- We do this well but inconsistently
- We do this well and consistently
- We do not do this (not applicable or must be started)
- We need to improve the way we do this (describe the changes to be made)

5. As you answer the questions, identify opportunities to make corrective changes:
 - Document any immediate corrective changes in the comments prior to submission. Continue to make corrective changes prior to the *Pharmacy Review*
 - Identify opportunities to make further corrective changes and discuss them with the CO during the *Pharmacy Review*
6. Click the **“Submit Pre-Review”** tab to submit the *Pharmacy Pre-Review*.



- The *Pharmacy Pre-Review* can only be **“Submitted”** once all the required information has been filled out

- If information is missing in a category(ies), a pop-up window will indicate the category(ies) and number of questions that are not complete

Pharmacy Profile Services Pre-Review **Submit Pre-Review**

Once you submit, your Pharmacy Pre-Review report will be available on eServices within 24 hours.

Submit Pre-Review

Unanswered Questions ✕

All questions need to be answered. Please either tick the compliant box if your pharmacy is compliant or include a comment if your pharmacy is non-compliant. The below sections have unanswered questions:

Section Name : Confidentiality
No of Questions : 1.

Section Name : Documentation
No of Questions : 2.

Section Name : PM Responsibilities
No of Questions : 45.

Section Name : Owner/Director Responsibilities
No of Questions : 7.

- In the specific category(ies), the missing field(s) will be highlighted in yellow

Pharmacy Profile Services Pre-Review **Submit Pre-Review**

Pharmacy Licensure

PM Responsibilities **Owner/Director Responsibilities**

Save changes Cancel changes

Legislation/Standard	Compliant	Comment
Subject to this Act and the bylaws, a pharmacist named in a pharmacy license as manager must personally manage and be responsible for the operation of the pharmacy.	<input type="checkbox"/>	
A full pharmacist may not act as manager of more than one pharmacy location, unless the pharmacy of which the full pharmacist is manager includes (a) a telepharmacy, (b) a hospital pharmacy, (c) a hospital pharmacy satellite, or (d) a pharmacy education site.	<input type="checkbox"/>	



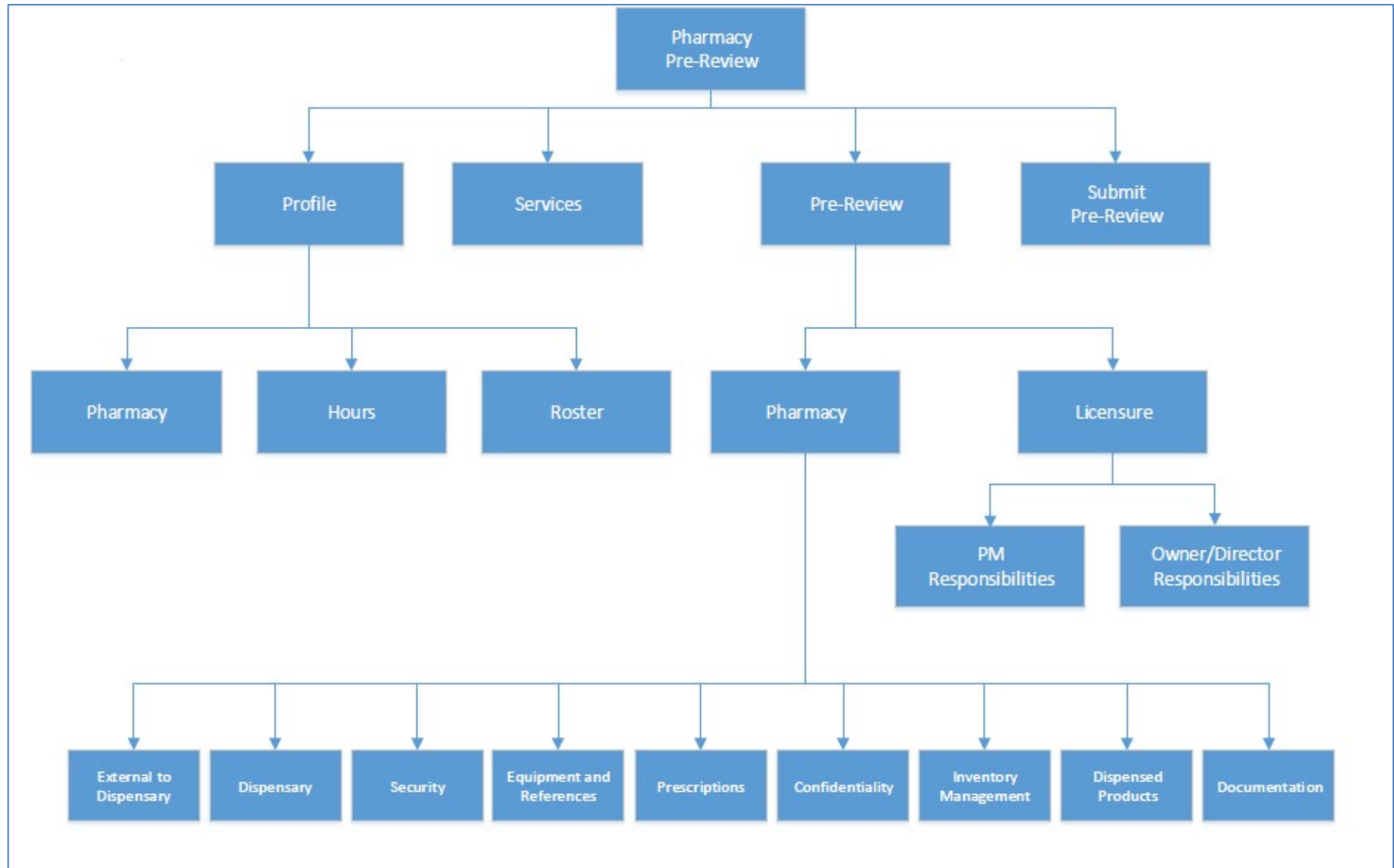
- Once **“Submitted”**, the *Pre-Review* can no longer be edited. The following will be displayed on the device screen:

Pharmacy Pre-Review successfully submitted

Thank you for submitting your Pharmacy Pre-Review to the College. We will be in touch with you to confirm the dates and details of your Practice Reviews.

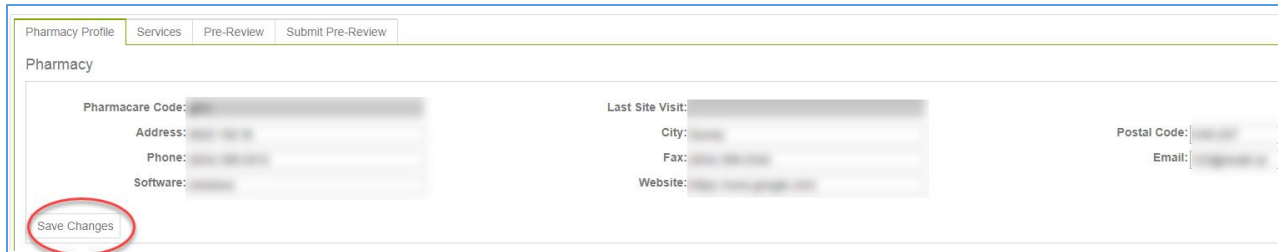
7. For help on how to access the **“Submitted”** *Pre-Review* Report: [click here](#).

The *Pre-Review* is organized as below:



Pharmacy Profile

- Ensure the information listed is up-to-date and remember to click **“Save Changes”**



Pharmacy Profile - Pharmacy Hours

- Enter your pharmacy operating and lock and leave hours in the table provided in the Pharmacy Profile tab. Remember to click **“Save Changes”**
 - If you do not have any lock and leave hours, please check the **“Not Applicable”** box
 - If your pharmacy is closed on specific dates, please check the **“Closed”** box

Pharmacy Hours Examples

- The following examples show pharmacies with different hours of operation
 - **Example 1:** Pharmacy operates Monday to Saturday, 9 a.m. - 5 p.m.

Pharmacy Hours (example)
 If your pharmacy is open until midnight, please select 11:30 PM using the drop down menu and type in 11:59 PM. 100% Dispensary:

Save changes Cancel changes

Day	Pharmacy Hours			Lock & Leave Hours		
	Start	End	Closed	Start	End	N/A
Sunday			<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Monday	09:00 AM	05:00 PM	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Tuesday	09:00 AM	05:00 PM	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Wednesday	09:00 AM	05:00 PM	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Thursday	09:00 AM	05:00 PM	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Friday	09:00 AM	05:00 PM	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Saturday	09:00 AM	05:00 PM	<input type="checkbox"/>			<input checked="" type="checkbox"/>
Holiday			<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>

- **Example 2:** Pharmacy operates Monday to Saturday, 9 a.m. to 5 p.m. and closes from 5 p.m. to 9 p.m. while the premise (store) is open

Pharmacy Hours (example)
 If your pharmacy is open until midnight, please select 11:30 PM using the drop down menu and type in 11:59 PM. 100% Dispensary:

Save changes Cancel changes

Day	Pharmacy Hours			Lock & Leave Hours		
	Start	End	Closed	Start	End	N/A
Sunday			<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>
Monday	09:00 AM	05:00 PM	<input type="checkbox"/>	05:00 PM	09:00 PM	<input type="checkbox"/>
Tuesday	09:00 AM	05:00 PM	<input type="checkbox"/>	05:00 PM	09:00 PM	<input type="checkbox"/>
Wednesday	09:00 AM	05:00 PM	<input type="checkbox"/>	05:00 PM	09:00 PM	<input type="checkbox"/>
Thursday	09:00 AM	05:00 PM	<input type="checkbox"/>	05:00 PM	09:00 PM	<input type="checkbox"/>
Friday	09:00 AM	05:00 PM	<input type="checkbox"/>	05:00 PM	09:00 PM	<input type="checkbox"/>
Saturday	09:00 AM	05:00 PM	<input type="checkbox"/>	05:00 PM	09:00 PM	<input type="checkbox"/>
Holiday			<input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>

Pharmacy Roster

- Update your pharmacy roster and remember to click **“Save Changes”**
 - You are only able to add registrants under this field
 - To remove a registrant who is no longer practicing at your pharmacy, please contact the Practice Review Department
 - Indicate whether your location is **“Not”** their primary practice by clicking the applicable box

Pharmacy Roster

Please update the pharmacy roster on eServices if you make any changes and advise the PRP department for scheduling purposes at PRP@bcpharmacists.org

Registration No.	First Name	Last Name	Registrant Type	Manager	Not Primary Practice
			PT	<input type="checkbox"/>	<input type="checkbox"/>
			PS	<input checked="" type="checkbox"/>	<input type="checkbox"/>
			PS	<input type="checkbox"/>	<input type="checkbox"/>

Services

- Indicate the services your pharmacy offers:
 - If you offer Residential Care services and you need to add more facilities, click **“Add new record”**
 - Enter the number of beds, patients, and facility name that you serve
 - Remember to click **“Save Changes”**

Pharmacy Profile | **Services** | Pre-Review | Submit Pre-Review

Please specify the number of beds/patients and enter facility name only if applicable. If you have multiple facilities, please click “Add New Record”.

Save changes | Cancel changes |

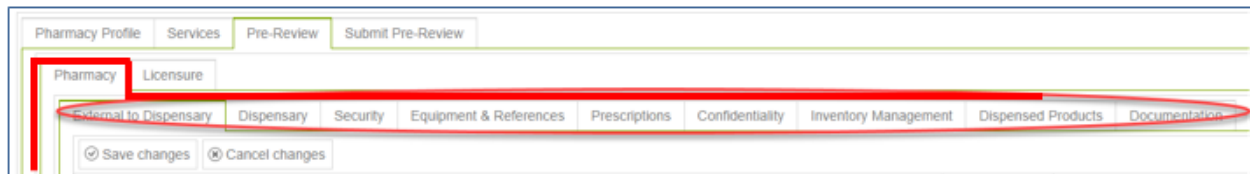
Service Name	Offered	# Beds
Methadone, Slow Release Oral Morphine, Buprenorphine/Naloxone	<input type="checkbox"/>	
Hazardous Sterile Compounding	<input type="checkbox"/>	
Residential Care	<input type="checkbox"/>	
Blister Packaging	<input type="checkbox"/>	
Injectable Opioid Agonist	<input type="checkbox"/>	
Telepharmacy	<input type="checkbox"/>	
Non-Hazardous Sterile Compounding	<input type="checkbox"/>	
Non-sterile Compounding	<input type="checkbox"/>	
Centralized Prescription Processing, Outsourced Prescription Processing	<input type="checkbox"/>	
Internet Pharmacy	<input type="checkbox"/>	

Pharmacy Pre-Review Categories

There are two Pharmacy Pre-Review categories: Pharmacy and Licensure. They are further divided into sub-tabs as below:

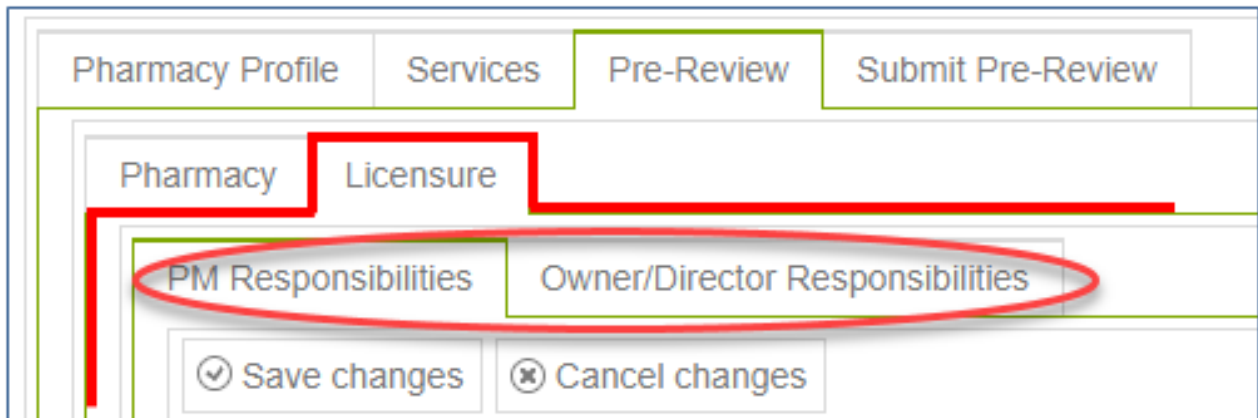
1. Pharmacy

- External to the Dispensary
- The Dispensary
- Security
- Equipment and References
- Prescriptions
- Confidentiality of Personal Health Information
- Inventory Management
- Dispensed Products
- Documentation



2. Licensure

- Pharmacy Manager's Responsibilities
- Owner/Director Responsibilities



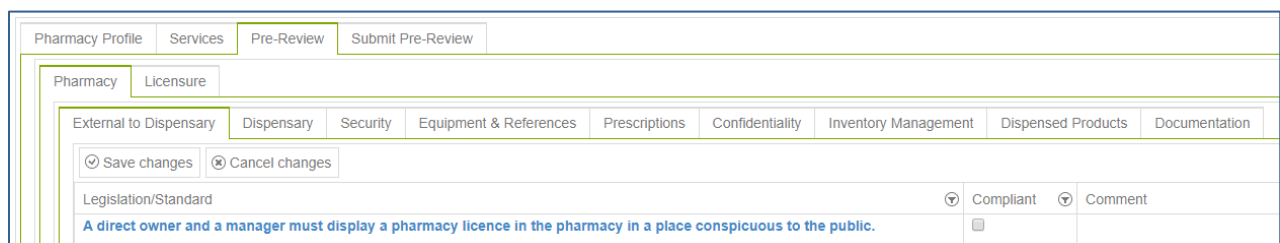
External to Dispensary Example

(Click to link to legislation and standards)

- The legislation for displaying the College license is:

- [PODSA Part 1 - 4.1\(2\)](#)

“A direct owner and a manager must display a pharmacy license in the pharmacy in a place conspicuous to the public.”



Pharmacy Profile		Services		Pre-Review		Submit Pre-Review											
Pharmacy		Licensure															
External to Dispensary		Dispensary		Security		Equipment & References		Prescriptions		Confidentiality		Inventory Management		Dispensed Products		Documentation	
Save changes		Cancel changes															
Legislation/Standard													Compliant	Comment			
A direct owner and a manager must display a pharmacy licence in the pharmacy in a place conspicuous to the public.													<input type="checkbox"/>				

How Does the Pharmacy Manager Answer This Question?

- Click "**Compliant**" if:
 - The pharmacy license is displayed in the pharmacy in a place conspicuous to the public
- Do not click "**Compliant**" if:
 - The pharmacy license is not displayed in the pharmacy in a place conspicuous to the public



What Does the CO Do with This Information?

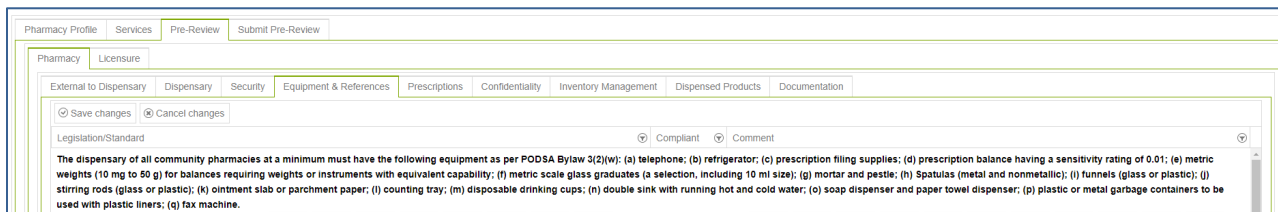
- The CO will have a record of the *Pre-Review* responses when they arrive at the pharmacy
- The CO will look for the pharmacy license to see if it is displayed in the pharmacy in a place conspicuous to the public
- The CO will then look at the *Pre-Review* response. If **“Compliant”** was not clicked and changes were to be made, the CO will confirm whether the changes have been made or not

Equipment and References Example

(Click to link to legislation and standards)

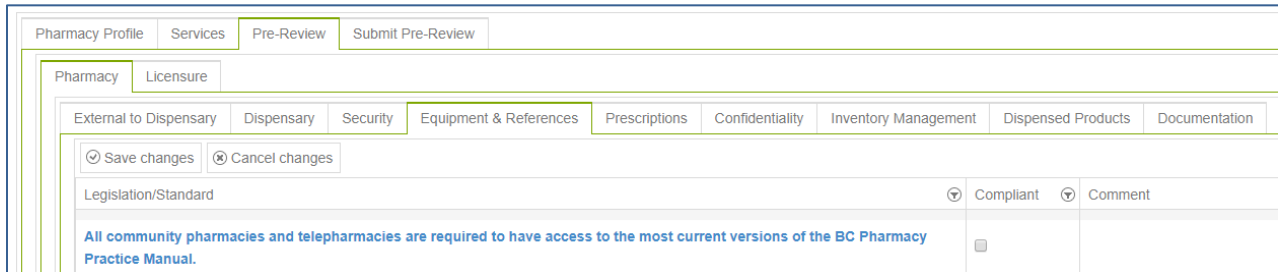
- The legislation for equipment is:
 - [Professional Practice Policy - 59 Pharmacy Equipment \(PPP-59\)](#)

"The dispensary of all community pharmacies at a minimum must have the following equipment..."



- The legislation for equipment is:
 - [Professional Practice Policy- 3 Pharmacy References \(PPP-3\)](#)

"All community pharmacies and telepharmacies at a minimum must have one of the following authorized library references in each of the categories listed..."





How Does the Pharmacy Manager Answer These Questions?

- Click "**Compliant**" if:
 - The specific equipment or reference is present and usable at the pharmacy
- Do not click "**Compliant**" if:
 - The specific equipment or reference needs to be purchased, fixed, or made usable at the pharmacy. The Pharmacy Manager will need to include the details of how and when the specific equipment or reference will be purchased, fixed, or refurbished as well as proof documents such as invoices, purchase orders or maintenance work orders

What Does the CO Do with This Information?

- The CO will have a record of the *Pre-Review* responses when they arrive at the pharmacy
- The CO will look for equipment and references at the pharmacy. They will determine if they are present and operational
- The CO will then look at the *Pre-Review* response. If "**Compliant**" was not clicked and changes were to be made, the CO will confirm whether the changes have been made or not

How does the College use the *Pharmacy Pre-Review*

- The *Pharmacy Pre-Review* provides the CO with an understanding of the current practice at the pharmacy prior to the Pharmacy Review;
- The CO confirms the accuracy of the answers submitted in the *Pharmacy Pre-Review*;
- The CO expects to see indicators of good practice for all *Pre-Review* questions where **“Compliant”** was clicked;
- The CO expects to see corrective changes and ongoing improvements for all *Pre-Review* questions where **“Compliant”** was not clicked;
- The CO independently reviews whether your pharmacy meets the expectations of the stated legislation during their visit

Pharmacy Manager's Responsibilities & Owner/Director Responsibilities

The questions in the Pharmacy Manager's Responsibilities and Owner/Director Responsibilities categories are directly linked to the following legislation:

(Click to link to legislation and standards)

- [**PODSA Part 2 – 11**](#)
 - A pharmacist named in a pharmacy license as Pharmacy Manager must personally manage and be responsible for the operation of the pharmacy
- [**PODSA Bylaws Part 2- 18 \(2\)\(a\)**](#)
 - The Pharmacy Manager must personally manage and be responsible for the daily operation of the pharmacy
- [**PODSA Bylaws Part 3- 24 \(1\)**](#)
 - A community Pharmacy Manager must establish and maintain written quality management policies and procedures
- [**PODSA Bylaws Part 2- 18 \(7\)\(b\)**](#)
 - A direct owner, directors and officers must ensure that the requirements to hold a pharmacy license under the Act are met at all times