

Identifying Patients and Patient Representatives for PharmaNet purposes in Community Pharmacy and Telepharmacy-Pharmacy Settings

~~This policy sets out requirements~~ provides guidance for registrants on complying with the *Pharmacy Operations and Drug Scheduling Act* ("PODSA") Bylaw ("PODSA Bylaw") w Bylaws section 36 in taking reasonable steps to confirm the identity of a patient, patient's representative, registrant or practitioner before providing any pharmacy service that requires accessing, using or ~~disclosure~~disclosing of patient personal health information.

POLICY STATEMENT(S):

1. Registrants ~~must~~ should ensure that only one PharmaNet patient record is created and maintained for each person and that only one Personal Health Number (PHN) is assigned to each person. By viewing and confirming appropriate identification documents, duplicate PHNs and patient records can be avoided.
2. Where a patient or patient's representative is personally known to the registrant, the registrant may positively identify the patient or patients' representative. In cases where the patient or patient's representative is not known to the registrant, positive identification is best achieved by viewing one piece of primary identification or two pieces of secondary identification. As a best practice, these steps should be documented. Below are some examples of primary and secondary identification.

PRIMARY IDENTIFICATION:

- Drivers License
- Passport
- Provincial Identity card issued by the Province of BC
- Police Identity Card issued by RCMP or Municipality
- Certificate of Indian Status Card
- Permanent Resident Card issued by the Government of Canada
- B.C. Services Card

SECONDARY IDENTIFICATION:

- Care card issued by the Province of B.C.
- Birth Certificate
- Canadian Citizenship Card
- Record of Landing of Permanent Residency
- Work/Visitor/Study Permit issued by the Government of Canada
- Naturalization Certificate
- Marriage ~~certificate~~ Certificate
- Change of Name Certificate
- Identification or Discharge Certificate from External Affairs Canada or Canadian Armed Forces
- Consular Identity Card

3. Where a patient or patient's representative does not have a primary or secondary ID, the registrant should use their professional judgement in identifying the patient or patient's representative. These steps should be documented.

BACKGROUND:

~~The above policy statements supplement PODSA Bylaw 36 which requires that registrants must take reasonable steps to positively identify a patient, patient's representative, registrant or a practitioner before providing any pharmacy service, including but not limited to:~~

- ~~(a) establishing a patient record,~~
- ~~(b) updating a patient's clinical information,~~
- ~~(c) providing a printout of an in-pharmacy or requesting a PharmaNet patient record,~~
- ~~(d) establishing, deleting, or changing a patient keyword,~~
- ~~(e) viewing a patient record,~~
- ~~(f) answering questions regarding the existence and content of a patient record,~~
- ~~(g)~~

- ~~(h) correcting information, and~~
- ~~(i) disclosing relevant patient record information to another registrant for the purpose of dispensing a drug or device, and/or for the purpose of monitoring drug use.~~

DRAFT

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