



Client Identity Verification

Purpose

This Regulatory Statement provides information and guidance to help pharmacies and pharmacy professionals meet the College bylaw requirements for professional licensees to confirm the identity of clients before providing services.

Background

Client identity verification refers to the matching of a client to the intended treatment or service. Risk to client safety or public safety arises from a potential mismatch between a given client and the pharmaceutical care intended for the client, whether the care is in the form of dispensing a medication, monitoring a client's drug therapy or something as simple as discussing or requesting a client's information over the phone. Proper identification of a client before any service, medication, or treatment is provided significantly reduces the potential for harm to occur through wrong-person procedures, privacy breaches, allergic reactions, medication errors, delays in care, or fraud/misrepresentation.

Requirements and Commentary

1. Community Pharmacies and Telepharmacies

Section 36 of the College bylaws under the *Pharmacy Operations and Drugs Scheduling Act* ("PODSA Bylaws") establishes a general requirement that a professional licensee must take reasonable steps to confirm the identity of a client or client's representative before providing any pharmacy service that requires accessing, using or disclosing client personal health information.

Section 1 of the *Pharmacy Operations and Drugs Scheduling Act* ("PODSA") defines "personal health information" as meaning recorded information about an identifiable individual that is related to the individual's health or the provision of health services to the individual.

This general requirement applies to all professional licensees providing services in a community pharmacy or telepharmacy. "Reasonable steps" means steps that are reasonable in the circumstances.

Where a client or client’s representative is personally known to the professional licensee, the professional licensee may positively identify the client or client’s representative. In cases where the client or client’s representative is not known to the professional licensee, 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.

Where a client or client’s representative does not have a primary or secondary identification, the professional licensee should use their professional judgment in identifying the client or client’s representative. These steps should be documented.

Professional licensees should ensure that only one PharmaNet client record is created and maintained for each individual and that only one Personal Health Number (“PHN”) is assigned to each individual. By viewing and confirming appropriate identification documents, duplicate PHNs and PharmaNet client records can be avoided.

Below are some examples of acceptable primary and secondary identification:

PRIMARY IDENTIFICATION	SECONDARY IDENTIFICATION
<ul style="list-style-type: none"> • Driver’s License • Passport • B.C. Services Card • Police Identity Card issued by RCMP or Municipality • Secure Certificate of Indian Status or Certificate of Indian Status (“Status Card”) • Permanent Resident Card issued by the Government of Canada 	<ul style="list-style-type: none"> • CareCard issued by the Province of BC • Birth Certificate • Canadian Citizenship Certificate • Canadian Citizenship Card • Record of Landing of Permanent Residency • Work/Visitor/Study Permit issued by the Government of Canada • Naturalization Certificate • Marriage Certificate • Change of Name Certificate • Identification or Discharge Certificate from External Affairs Canada or Canadian Armed Forces • Consular Identity Card

2. Hospitals and Residential Care Facilities

While the general requirement in section 36 of the PODSA Bylaws does not distinguish between pharmacy type, it is effectively overridden by the more specific practice standards

established under the *Health Professions and Occupations Act* (“HPOA”) respecting client identity confirmation in hospitals and residential care facilities.

Under section 5 of Schedule E.2 of the College bylaws under the HPOA, all professional licensees must use at least two person-specific identifiers to confirm the identity of a client, before providing any pharmacy service to the client in or from a hospital pharmacy or a hospital pharmacy satellite.

Under section 8 of Schedule E.3 of the College bylaws under the HPOA, all professional licensees must use at least two person-specific identifiers to confirm the identity of a resident before providing any pharmacy service to the resident.

At least two person-specific identifiers are required in these settings because professional licensees and clients may not be in the same location at the point of care.

In hospital settings, the requirement for at least two person-specific identifiers does not apply when dispensing to staff, outpatients or the general public in accordance with section 6(5) of Schedule E.2 of the College bylaws under the HPOA.

Acceptable person-specific identifiers under Schedule E.2 and Schedule E.3 of the HPOA bylaws are:

- Client’s/resident’s full name.
- Client’s home address, if confirmed by the client/resident or their family.
- Client date of birth.
- Client personal identification number (e.g. hospital account number, medical record number).
- An accurate photograph.

In long-term or continuing care settings where the registrant is already familiar with the client or resident, facial recognition is also an acceptable person-specific identifier.

The following are examples of person-specific identifiers that are not acceptable:

- A client’s/resident’s room or bed number.
- A home address that has not been confirmed with the client/resident or the client’s/resident’s family.
- Facial recognition in acute care settings.

Disclaimer: The information provided in this Regulatory Statement reflects the College's approach to interpreting and applying the referenced bylaw requirements. This Regulatory Statement does not constitute legal advice. The College assumes no responsibility or liability to any person who relies on the information in this Regulatory Statement and the College disclaims all liability regarding such information. Persons intending to act on the basis of information provided in this Regulatory Statement are encouraged to first obtain independent legal advice from a lawyer who is authorized to practice law in British Columbia and is familiar with the person's circumstances.

Legislation

- HPOA s. 72(2)
- HPOA bylaws s. 117
- HPOA bylaws Schedule E.2 – Practice Standards: Hospital Pharmacy Services s. 2, s. 6
- HPOA bylaws Schedule E.3 – Practice Standards: Residential Care Facility Services s. 8
- PODSA s. 7.1, s. 21(1)
- PODSA Bylaws s. 36

Additional Information

This Regulatory Statement replaces and supersedes Professional Practice Policy-54 and Professional Practice Policy-75.

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