



## Frequently Asked Questions

### [Health Canada Exemption/Regulatory Amendments](#)

#### **Continued Care Prescriptions**

##### **1. Can I prescribe consecutive *continued care prescriptions* for narcotics and controlled drugs?**

Section 21(3) of the *Pharmacist and Pharmacy Technician Regulations* lists the prohibitions on Continued Care Prescriptions:

No pharmacist shall

- (a) give a continued care prescription to a patient for an amount of a drug that exceeds the amount authorized per refill under the original prescription;
- (b) authorize refills of a continued care prescription; or
- (c) give consecutive continued care prescriptions to a patient for the same drug.

**During a public health state of emergency declared under the *Public Health Act* or a state of emergency declared under the *Emergency Measures Act*, this subsection does not apply.**

During the public health state of emergency, you may prescribe consecutive continued care prescriptions.

##### **2. When prescribing a *continued care prescription* for a narcotic or controlled drug, can I exceed the quantity originally prescribed by the prescriber?**

Yes, **during a public health state of emergency declared under the *Public Health Act* or a state of emergency declared under the *Emergency Measures Act***, the prohibition on exceeding the amount authorized per refill under the original prescription does not apply. After an assessment of the appropriateness of therapy, you may exceed the quantity originally prescribed by the prescriber on continued care prescriptions, if it is in the best interest of the patient to receive a greater amount.

##### **3. I have written a *continued care prescription* for my patient for a benzodiazepine. Am I able to add a refill to my prescription?**

Yes, **during a public health state of emergency declared under the *Public Health Act* or a state of emergency declared under the *Emergency Measures Act***, the prohibition on authorizing refills of a continued care prescription does not apply. After an assessment of the appropriateness of therapy, you may add refills to continued care prescriptions if it is in the best interest of the patient.

4. A patient has arrived at my pharmacy requesting a *continued care prescription* for a controlled drug. The original prescription is held at a pharmacy that is now temporarily closed due to staff illness. Can I prescribe a *continued care prescription* for this patient?

Yes, you can prescribe a continued care prescription for this patient.

Subsection 21(1)(e) of the *Pharmacist and Pharmacy Technician Regulations* has been revoked. An original prescription no longer needs to have been dispensed at the same pharmacy from which the pharmacist is giving the continued care prescription.

### **Emergency Prescribing**

5. A patient has arrived at my pharmacy complaining of pain due to a back injury. He has not had a previous prescription for the injury. Can I prescribe a narcotic or controlled drug?

No, the prohibition on emergency prescribing of monitored drugs remains in place (Section 22 of the *Pharmacist and Pharmacy Technician Regulations*.) During a public health state of emergency declared under the *Public Health Act* or a state of emergency declared under the *Emergency Measures Act*, you may only prescribe continued care prescriptions for those patients who have already had a prescription for the same drug. You may not initiate therapy for a monitored drug.

### **Therapeutic Substitution**

6. My patient has a prescription for a narcotic (with part-fills remaining) which is now short from the manufacturer. Am I able to complete a *therapeutic substitution* to change the prescription to an alternate drug that I have in stock?

No, the prohibition on therapeutic substitution for a monitored drug remains in place (Section 18 of the *Pharmacist and Pharmacy Technician Regulations*.)

### **Adaptation**

7. My patient has a prescription for a benzodiazepine (with refills remaining.) He is complaining of excessive drowsiness lasting throughout the day. Am I able to *adapt* the prescription to a benzodiazepine with a shorter duration of action to alleviate the side effect?

No, the prohibition on adaptation for a monitored drug remains in place (Section 18 of the *Pharmacist and Pharmacy Technician Regulations*.)

## Delivery

8. **My patient is self-isolating since she has returned from out of province. Am I able to have my pharmacy assistant deliver her prescription for a controlled drug?**

Yes, you may have pharmacy staff deliver prescriptions for controlled substances. However, you must follow the guidance in the [Health Canada exemption](#).

## Methadone

9. **A prescriber has just called my pharmacy to adjust the methadone dose for one of my patients. Am I able to accept the methadone prescription over the phone?**

Yes, you can accept the prescription verbally.

Subsection 8(2) of the *Pharmacy Act* General Regulations has been revoked and the Schedule to the regulations has been revoked. Methadone prescriptions are not required to be faxed to the pharmacy on the methadone fax form.

10. **One of my regular patients has a prescription for methadone. Unfortunately, her prescription has run out and her physician is unavailable. Am I able to offer her a *continued care prescription*?**

Yes, *if you have an extended practice certificate in dispensing methadone and suboxone*, you may prescribe a continued care prescription for methadone **during a public health state of emergency declared under the *Public Health Act* or a state of emergency declared under the *Emergency Measures Act*.**

## Transfers

11. **My patient has been working in another province and has now returned to PEI and is in self-isolation. Am I able to transfer his prescription for a narcotic from his pharmacy outside of PEI?**

No. The current Health Canada exemption allows transfers for narcotics and controlled drugs within the same province or territory only.

12. **The same patient has a prescription for a benzodiazepine which I previously transferred to a pharmacy out of province. There are refills remaining on the prescription. Am I able to transfer the prescription back to my pharmacy?**

Yes, pharmacists are currently exempted from Subsection 54(1) of the *Benzodiazepine and other Targeted Substances Regulations*. The exemption allows a prescription for a targeted substance to be transferred, even if it has already been transferred.