



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
de quartier**

**Office of the Chief Executive Officer**

365 Bloor Street East, Suite 2003  
Toronto, ON M4W 3L4  
T : 416.226.9100  
F : 416.226.9185  
info@neighbourhoodpharmacies.ca  
neighbourhoodpharmacies.ca

November 29, 2021

Natasha Thambirajah  
Director, Digital Health Policy  
Digital Policy, Security and Privacy Branch || Health Sector IM/IT Division  
Ministry of Health, Province of British Columbia  
[natasha.thambirajah@gov.bc.ca](mailto:natasha.thambirajah@gov.bc.ca)

**RE: Consultation on draft *Policy on Digital Signatures***

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) provides this submission on behalf of Canada's leading pharmacy organizations trusted with delivering high value, quality care in all models including chain, banner, long-term care, specialty, independent pharmacies as well as grocery chains and mass merchandizers with pharmacies.

Neighbourhood Pharmacies' contributions to this consultation are grounded in the need to ensure that Canadian patients do not experience unintended consequences from policy implementation that will affect their access to medicines and quality of care while still ensuring that pharmacies can sustain effective and efficient delivery of services.

The pandemic has offered many opportunities for the healthcare sector to reflect on how technology can be used to increase access to care, quality outcomes and overall patient experience. In the context of the delivery of care by regulated pharmacists and pharmacy technicians, the College of Pharmacists of British Columbia currently defines a "signature" on record as being either handwritten in ink or electronic, according to their Pharmacy Operations and Drug Scheduling By-Laws. Several other pharmacy regulatory authorities in other provinces have made similar temporary or permanent policy changes to expand the definition of signatures to include digital signatures in addition to 'wet' signature to support continuity of patient care in the face of public health restrictions imposed because of the pandemic.

**Neighbourhood Pharmacies applauds the Government's desire to facilitate the use of digital signatures in healthcare, in addition to 'wet' signatures.**

While we have no particular concerns with the current content of the draft policy as written, we do provide several factors or considerations that should be taken into account as policy development moves forward:

- Ensure that the policy does not place undue administrative burdens or limitations on pharmacy operators who are already using a variety of pharmacy information systems that adhere to all practice and regulatory requirements.
- Allows for integration of systems where secure sharing of documentation or information with a signature is required.
- Ensures any digital signature systems are efficient and accessible to patients, including those without a high degree of technical literacy; and

- Ensures that technical solutions for digital signatures are developed in collaboration with health care providers and respects their existing technical infrastructure.

With respect to digital/electronic prescriber signatures, we encourage the Ministry to minimize, wherever possible, any additional 'gatekeeping' responsibilities imposed on pharmacists to validate whether prescribers have met all Ministry requirements for digital signatures. Pharmacists are always expected to use their professional judgement when evaluating the legitimacy of a prescription authorization. If there are any doubts or uncertainty around whether a prescription was authentically generated by the indicated practitioner, the pharmacist will always exercise due diligence to confirm the authenticity. The requirement to further validate the appropriateness of a digital signature may potentially add additional complexity to the pharmacists' responsibilities.

In addition, we encourage the Ministry of Health to pay particular attention to the use of digital/electronic signatures in electronic prescribing. We note that, in Alberta, digitally signed prescriptions are may only be accepted by a pharmacy if sent directly to the dispensing pharmacy via Electronic Medical Records. This is a challenge in specialty pharmacy when prescriptions are often created on patient support program (PSP) enrollment forms and thus are distributed by the PSP instead of sent directly to a pharmacy from the specialist. This creates an obstacle to efficient patient care, and we hope the Ministry will take steps to circumvent this problem in B.C.

We further recommend the Ministry leverage the insights from this consultation to explore additional technological solutions to expand the ability of all healthcare providers, including pharmacists and their teams, to provide efficient and effective care to patients. We welcome the opportunity to consult with the Ministry on any of the following possibilities:

- Continued expansion of virtual patient consultations including video, audio, or live chat.
- Online patient appointment systems to manage patient flow and integrate with inventory management.
- Integrated medication applications that can streamline the patient experience to order medications, refills, or receive medication-related reminders, etc.

Thank you for the opportunity to contribute to this consultation.

Sincerely,



Sandra Hanna, RPh.  
Chief Executive Officer

CC: Nicole Rennie, [Nicole.Rennie@gov.bc.ca](mailto:Nicole.Rennie@gov.bc.ca)