



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

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RE: Consultation on draft *Policy on Fax Machine Use in the Health Sector*

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 particular, the pandemic has highlighted the healthcare sector's continued reliance on fax use. **Neighbourhood Pharmacies is overall supportive of and welcomes the Ministry of Health's efforts to minimize - and work towards eliminating - fax machine use for all communication within the healthcare sector.**

We further support the Ministry's commitment to a phased approach, which considers the current and entrenched use of fax machines in a variety of healthcare workflow processes. The elimination of fax use has the potential to significantly disrupt many workflow systems. Time, effort, and effective change management will be required to develop revised procedures to accommodate reduced and eliminated fax use. It is important that the Ministry recognize there may be no viable alternatives to fax use in the near term in certain scenarios.

We understand this consultation and draft policy is a first step in securing approval for the concept. Further policy development will be supported by technical standards and as such the Ministry is not seeking detailed technical feedback regarding implementation of this policy at this time. We therefore offer some high-level feedback, factors, and outstanding questions for the Ministry to consider in the progression of this policy. Specifically, we encourage the Ministry to:

- Ensure any 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 is required.
- Ensures all digitized systems are efficient and accessible to patients, including those without a high degree of technical literacy.
- Ensures that technical solutions for digital systems are developed in collaboration with health care providers and respects their existing technical infrastructure.
- Ensures that this policy is developed to align with any policies on the use of digital signatures or e-prescribing that will impact healthcare delivery; and
- Ensures that the policy is developed to align with the regulations and standards of practice of all licensed healthcare providers in the province.

Some areas requiring further clarification as the policy is developed include the following:

- The definition of “interoperability”, or how healthcare providers may determine when it has been achieved.
- Ministry decisions on digital interoperability/conformance standards; these should be accessible to all companies/organizations and should not be so difficult as to limit innovation (or create a monopoly).
- Potential resources or supports to assist the healthcare sector in implementing any policies that come into force.
- Exemption processes.
- Elaboration of what is meant by “required” communication by fax, and if documentation will be required to justify such required communication (e.g., a healthcare provider’s regulatory college may stipulate that certain information must be transmitted by “fax”).

Some further consultation is suggested to identify scenarios where elimination of fax use might not be feasible. For example, we have identified that pharmacies in B.C. may need to keep a fax machine until all other provinces move in this direction as well, to accept out-of-province prescriptions, particularly for border locations. If all provinces move in this direction, they must work together to ensure the same solution can be applied across jurisdictions.

We recommend the Ministry continue to consult closely with providers in terms of setting targets, milestones, requirements and clear timelines with dates as well as ensuring that any implementation phases provide all healthcare organizations with time to evolve to a digital practice. Finally we urge the Ministry to continue to collaborate with healthcare providers to thoroughly analyze all workflow processes across the province’s healthcare sector which make use of fax machines to ensure the development of appropriate digital solutions that integrate with existing technical and information management systems .

We do wish to note that that all pharmacies have internet access to adjudicate pharmacy claims electronically which lends itself to more secure electronic communication, such as a move to digitize all fax communication. The community pharmacy sector recognizes that innovations in digital and electronic processes can be used effectively to manage costs, simplify workflow, and reduce risk.

We 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 phase of the consultation. We look forward to more engagement as this work progresses.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Hanna', is positioned above the typed name.

Sandra Hanna, RPh.
Chief Executive Officer

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