

February 26, 2009

HPRAC Consultations
Ministry of Health and Long-Term Care
56 Wellesley Street West, 12th Floor
Toronto ON
M5S 2S3

Re: CAHO Response to the HPRAC *Critical Links* Report

Dear Minister Caplan:

We are writing on behalf of the Drugs and Therapeutics Committee of the Council of Academic Hospitals of Ontario (CAHO) in response to the recently released HPRAC report entitled *Critical Links: Transforming and Supporting Patient Care (January 2009)*. CAHO represents the 25 academic hospitals in Ontario that provide an academic environment for teaching, research and specialized care. The Drugs and Therapeutics Committee, comprised of Pharmacy Leaders with CAHO Hospitals, informs and advises CAHO hospital leadership, the Ministry of Health and Long-Term Care, and the Ontario Hospital Association on pharmaceutical matters relating to CAHO patient care, academic mission, education and research, and operational and planning issues.

In general, the CAHO Drugs and Therapeutics Committee understands the argument for the directions outlined in the report. In particular, we applaud the report's progressive efforts to increase access to care and inter-professional collaboration. As CAHO represents the province's academic health sciences centres, our hospitals are particularly experienced with promoting and nurturing effective inter-professional collaboration between the various roles contained within our institutions. In addition, our hospitals and their affiliated research institutes are where our province's leading scientists are producing world-class medical breakthroughs and research. It is through CAHO's position as Ontario's leaders of inter-professional collaboration in care delivery and leaders of science that we would like to comment on the recently released *Critical Links: Transforming and Supporting Patient Care (January 2009)*.

We have the following specific comments on the HPRAC *Critical Links* report:

- *Ensuring Appropriate Knowledge, Skill & Judgment with Controlled Acts:* Medications should always be prescribed and dispensed by someone possessing the appropriate knowledge, skill, and judgement. The Committee has concerns over whether the expanded scope of prescribing outlined in the report will bring some health professions, particularly nursing, into the realm of prescribing without the appropriate training behind them. As an example, the ability to properly prescribe narcotics requires training and certification that a nurse does not possess. While the Committee supports changing scopes of practices, we feel that the report describes an environment of open-ended prescribing; a philosophy of open-ended prescribing is not one that we support.

- *Providing Antimicrobial Stewardship:* Antimicrobial resistance is rising. The Committee has concerns around prescription frequency, and whether the expanded scope outlined in the report will create a situation where over-prescribing of antimicrobials leads to increased antimicrobial resistance. Consultation with experts who possess an intimate knowledge of pharmaceuticals is necessary when properly considering issues of drug resistance. The Committee would like to stress the importance of considering aspects of resistance when prescribing antimicrobials and feels that this issue is not addressed in the report. As well, consideration should be given to not expanding anti-infective medications to all professions. At a time when infectious disease experts universally bemoan the over-prescribing of anti-infectives that have in part led to problematic multi-resistant organisms, and advocate the need for antibiotic stewardship, expanding this prescribing authority would seem counter to the public good.
- *Enabling Public Health & Medication Safety:* Medications should not be treated as commodities. While many representative colleges see prescribing as the next step in practice for their respective professions, the Committee is concerned that the sensitive scientific factors involved with drugs and various therapeutics may not be fully taken into consideration by the professions outlined in the report. The scientific authorities in our hospitals are concerned about a situation, for example, where a Naturopath is able to prescribe anti-infectives. High-risk medications in general will become increasingly vulnerable to errors in prescribing, dispensing, and administering under the new system outlined in the report. The Committee is concerned that patient safety and public health may be put at risk as medications are increasingly treated as commodities that may be prescribed and dispensed by all. Such an approach of open-ended prescribing and dispensing is contrary to the large body of evidence concerning patient and system safety; any approach to expand these restricted acts to other professions must necessarily include how such factors would be successfully addressed. The Committee feels that this issue should be more directly addressed in the report.
- *Supporting Inter-professional Collaboration:* Quality pharmaceutical care requires a fulsome, ongoing process that pulls from the knowledge and skills of many trained professionals. The processes involved in maintaining proper medication management necessitate the interfacing of many medical professions and complex systems. The Committee feels that there is a system side of safety that still needs to be more fully addressed in the report. As experts in the field of inter-professional collaboration, the Committee supports the concept of collaboration between professions producing greater access to care and higher-quality clinical outcomes. Still, the Committee feels that the processes required to achieve said collaboration are not adequately described in the report.

Overall, the Committee respects the transformative nature of the HPRAC *Critical Links* report. As the province's leaders in healthcare innovation, we recognize the importance of re-thinking our healthcare system in order to adjust to today's changing needs and demands. Still, the Committee feels that said transformation should be informed by evidence-based knowledge, and that any new system should not sacrifice quality or continuity of care.



Leadership and discovery
for tomorrow

Council of
Academic Hospitals
of Ontario

Conseil des
hôpitaux universitaires
de l'Ontario

200 Front Street West
Suite 2800
Toronto, ON M5V 3L1

Tel: 416 205-1336
Fax: 416 205-1344
www.caho-hospitals.com

The report opens up significant multiplicity in prescribing and dispensing in the interest of greater access by the public. However, access expansion to this extent may not only risk quality and safety, but further compromise the collaborative approach of multiple expertise already proven to be a more effective system of medication therapy management. The Committee strongly suggests that controlled expansion of prescriptive and dispensing authority be balanced with a clear focus to drive collaboration in care. While the report does offer an avenue towards increased access to care, it does not sufficiently address increasing access to *quality* care. While providing more options for patients to access care is important, it is the quality of said care that the Committee is concerned may deteriorate under the system outlined in the report.

The Committee recommends that HPRAC and the Ministry of Health and Long-Term Care proceed with caution when initiating the systems and scopes outlined in the report and consider the impacts on quality of care, continuity of care, and patient safety that the changes within will have on our Ontario healthcare system.

We welcome the opportunity to be engaged in providing the expertise of the Hospital Pharmacy sector so as to support further development of this project.

To discuss the above comments, or respond to any questions you may have, please feel free to contact our Committee Co-Chairs: Richard Jones, Director of Pharmacy at London Health Sciences Centre; and Bill Wilson, Director of Pharmacy at Mount Sinai Hospital; through the CAHO Secretariat at 1-416-205-1324.

Sincerely,

Richard Jones
Co-Chair
CAHO Drugs and Therapeutics Committee

Bill Wilson
Co-Chair
CAHO Drugs and Therapeutics Committee

cc Barbara Sullivan
Chair, Health Professions Regulatory Advisory Council