

College of Pharmacists
of British Columbia



PHARMACY PRE-REVIEW
TUTORIAL



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Goal of the Practice Review Program (PRP)

- To protect public safety by improving compliance with College Bylaws and Professional Practice Policies
- To increase awareness, understanding and compliance with all applicable legislation, standards, and College expectations as a regulated pharmacy professional and of a licensed pharmacy; and
- To ensure consistent delivery of pharmacy services across British Columbia by observing regulated pharmacy professionals in their own practice settings as they perform daily duties

The *Pharmacy Pre-Review* is

- The responsibility of the Pharmacy Manager to complete and submit
- A self-evaluation of the pharmacy and responsibilities of the Pharmacy Manager, Direct Owners, Directors and Officers which engages Pharmacy Managers and staff in a self-assessment of their practice and pharmacy
- A tool to identify the strengths and areas of improvement for the pharmacy so corrective changes (e.g. staffing, educational, physical, and professional practice changes) can be made prior to the *Pharmacy Review*
- Directly linked to the legislated requirements
 - Will have the same questions that the Compliance Officers (CO) will be evaluating during the *Pharmacy Review*;
 - If the pharmacy provides other optional services (such as Residential Care, Compounding), questions applicable to those services will be used at the *Pharmacy Review*; and
 - If there has been a change in requirements between the *Pre-Review* and the *Pharmacy Review*, the pharmacy will be reviewed using the current standards
- An educational tool that assists the Pharmacy Manager to prepare for the *Pharmacy Review*

Note: Please allow approximately 2 hours to complete the entire *Pharmacy Pre-Review*.

Get Staff Involved

- Prepare for the *Pharmacy Pre-Review* by reflecting on your practice in a systematic way; evaluate the way you and your staff work, and what outcomes you achieve when answering each question.

- **It is beneficial to have staff participate in the *Pharmacy Pre-Review***
 - Staff can assist to answer the *Pre-Review* questions by identifying the strengths and areas for improvement in the pharmacy

- **If staff do not participate**
 - It is recommended that the Pharmacy Manager share the completed *Pre-Review* before it is submitted to the College

Applicable Legislation and Standards

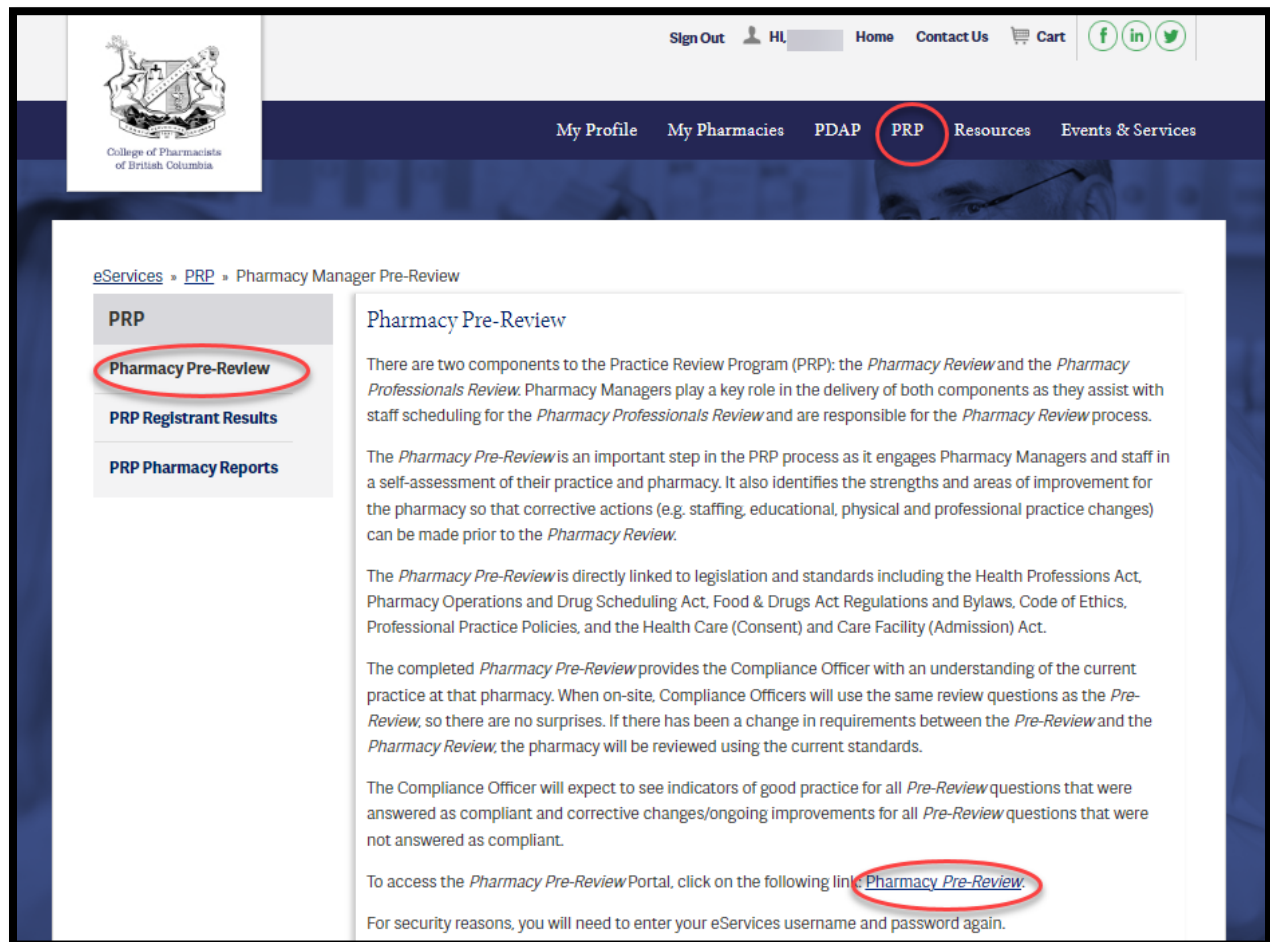
All of the *Pharmacy Pre-Review* questions are directly linked to the following legislation and standards:

(Click to link to legislation or standard)

- [**Health Professions Act \(HPA\)**](#)
 - [Regulations and Bylaws](#)
- [**Pharmacy Operations and Drug Scheduling Act \(PODSA\)**](#)
 - [Regulations and Bylaws](#)
- [**Code of Ethics – HPA Bylaws - Schedule A**](#)
- [**Professional Practice Policies \(PPP\)**](#)
- [**Health Care \(Consent\) and Care Facility \(Admission\) Act**](#)
- [**Food & Drugs Act and Regulations**](#)

Pharmacy Pre-Review Instructions

1. Use the link included in the selection email to access the *Pharmacy Pre-Review* through eServices. Alternatively, log into “eServices”, select the “PRP” tab and then “*Pharmacy Pre-Review*” to access the Pharmacy Pre-Review link.



The screenshot displays the eServices portal interface. At the top, there is a navigation bar with links for 'Sign Out', 'HL', 'Home', 'Contact Us', and 'Cart'. Below this is a dark blue header with 'My Profile', 'My Pharmacies', 'PDAP', 'PRP', 'Resources', and 'Events & Services'. The 'PRP' link is circled in red. On the left, a sidebar menu shows 'PRP' with sub-items: 'Pharmacy Pre-Review' (circled in red), 'PRP Registrant Results', and 'PRP Pharmacy Reports'. The main content area is titled 'Pharmacy Pre-Review' and contains several paragraphs of text. At the bottom of the text, a link 'Pharmacy Pre-Review' is circled in red. The text describes the two components of the PRP: the Pharmacy Review and the Pharmacy Professionals Review, and explains the role of Pharmacy Managers. It also mentions that the Pharmacy Pre-Review is directly linked to legislation and standards, and that the completed Pre-Review provides the Compliance Officer with an understanding of the current practice at that pharmacy.

2. Login to the Pharmacy Pre-Review. For security reasons, you will need to enter your eServices username and password again.

Pharmacy Information Services Roster Participants Itinerary Pre-Review Login

College of Pharmacists
of British Columbia

Practice Review Program: Pre Review

Enter your eServices username and password to continue

If you do not know your username and/or password, please contact the College at eServices@bcpharmacists.org

Username*

Password*

- Once you are logged in, review and verify the information on the “Pharmacy Information” tab, “Services” tab and “Roster” tab. If you notice discrepancies, log in to eServices to make changes. You may also upload additional information such as diagrams and staff schedules.

Pharmacy Information Services Roster Pre-Review Login

Location

Please review the pharmacy information below and confirm it's up to date. If you notice discrepancies, log in to [eServices](#) to make changes.

Profile

Operating Name:	TEST PHARMACY	Signage Name:	TEST PHARMACY 123
Last Review Date:	Thu May 05 2022 17:20:28 GMT-0700 (Pacific Daylight Time)	Pharmacy iMIS ID:	
Pharmacare Code:		Address:	BC CANADA

Hours

Day	Pharmacy Hours		Lock & Leave Hours	
	Start	End	Start	End
Monday	09:00 AM	05:00 PM	n/a	
Tuesday	08:00 AM	05:00 PM	n/a	
Wednesday	09:00 AM	05:00 PM	n/a	
Thursday	08:00 AM	05:00 PM	n/a	

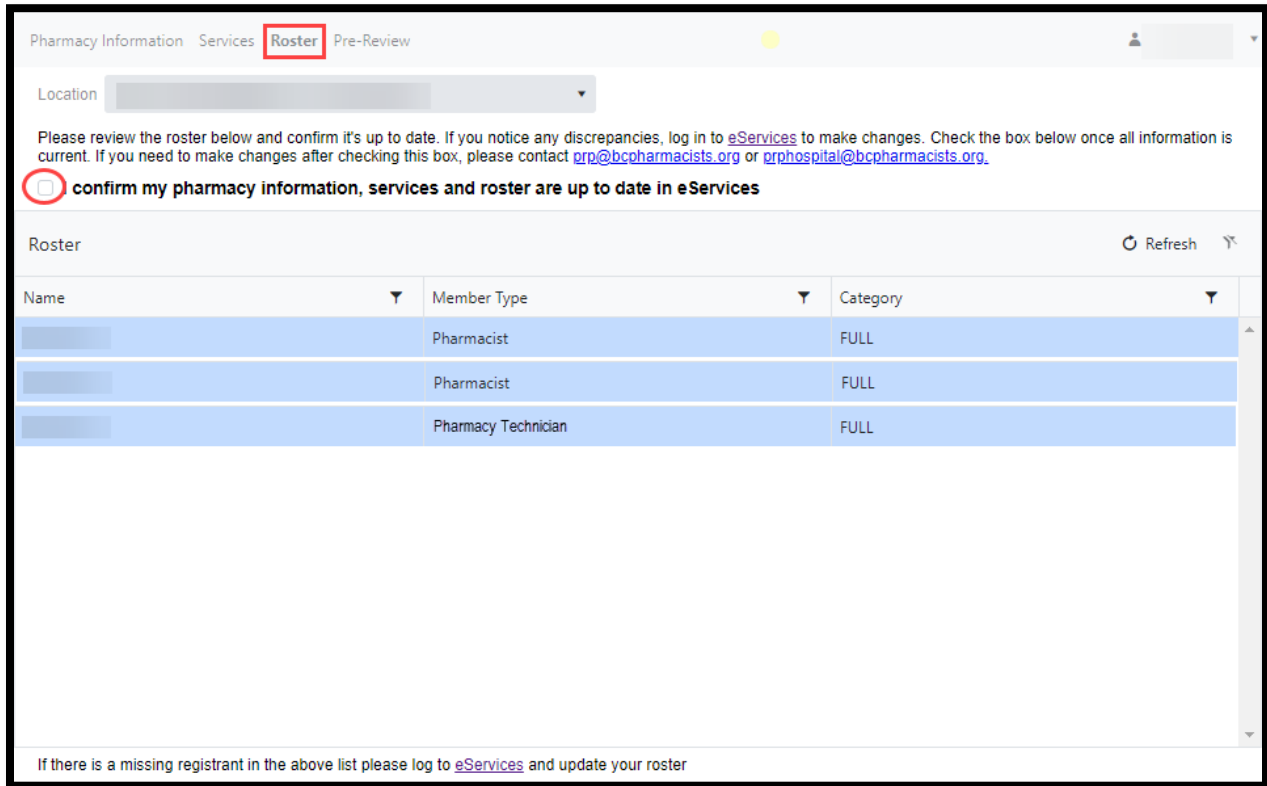
Upload Additional Information Upload Download Delete

You may upload any additional pharmacy information here (for example: diagrams, st

File Name

No attachments available

- Once you have reviewed and verified the information on the “Pharmacy Information” tab, “Services” tab and “Roster” tab, check the “I confirm my pharmacy information, services and roster are up to date in eServices” box on the “Roster” tab. If you need to make changes after checking this box, please contact prp@bcpharmacists.org or prphospital@bcpharmacists.org.



Pharmacy Information Services **Roster** Pre-Review

Location

Please review the roster below and confirm it's up to date. If you notice any discrepancies, log in to [eServices](#) to make changes. Check the box below once all information is current. If you need to make changes after checking this box, please contact prp@bcpharmacists.org or prphospital@bcpharmacists.org.

confirm my pharmacy information, services and roster are up to date in eServices

Roster Refresh

Name	Member Type	Category
	Pharmacist	FULL
	Pharmacist	FULL
	Pharmacy Technician	FULL

If there is a missing registrant in the above list please log to [eServices](#) and update your roster

- Click the “Pre-Review” tab and answer all the questions in each category and sub-tab.

Pharmacy Information Services Roster **Pre-Review** Help

Location Submit Pre-Review

Click on the 'Help' button for Pharmacy Pre-review information and instructions

- ▶ PY: CMN: Pharmacy
 - PY: CMN: External to Dispensary**
 - PY: CMN: Dispensary
 - PY: CMN: Security
 - PY: CMN: Equipment & References
 - PY: CMN: Prescriptions
 - PY: CMN: Confidentiality
 - PY: CMN: Inventory Management
 - PY: CMN: Dispensed Products
 - PY: CMN: Documentation
 - ▶ PY: CMN: Licensure
 - ▶ PY: CMN: Residential Care
 - ▶ PY: CMN: Telepharmacy

Legi...	Question	Compliant	Comments
PODSA Bylaws s.27(2)(a)	The registrar is notified of the hours during which a full pharmacist is not present.	<input type="checkbox"/>	
PODSA Bylaws s.27(2)(c)	The hours when a full pharmacist is on duty are posted.	<input type="checkbox"/>	
PODSA s.4.1(2)	A direct owner and a manager must display a pharmacy licence in the pharmacy in a place conspicuous to the public.	<input type="checkbox"/>	
PODSA Bylaws c.25(4)	In all new and renovated community pharmacies or telepharmacies, an appropriate area must be provided for patient consultation that (a) ensures privacy and is conducive to confidential communication, and (b) includes, but is not	<input type="checkbox"/>	

Attachment Upload Download Delete

File Name
No attachments available

Select your answer(s) based on the following:

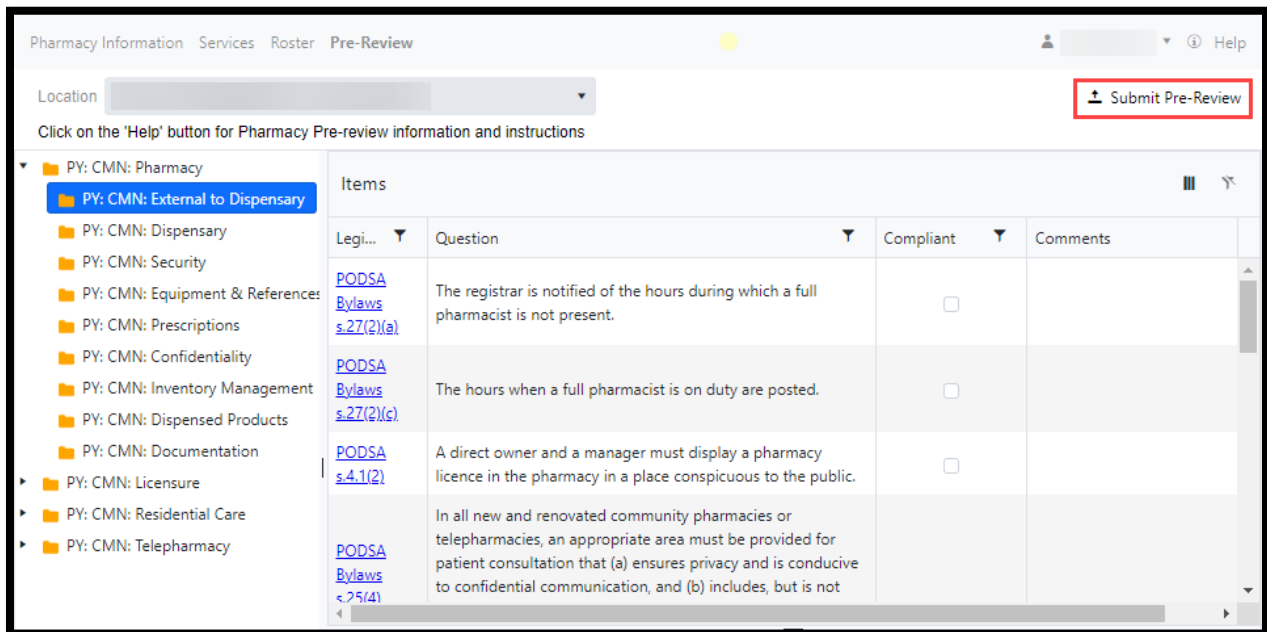
- Click the **“Compliant”** box if you/the pharmacy is compliant
- Do not click the **“Compliant”** box if you/the pharmacy is not compliant
- Do not click the **“Compliant”** box if the item does not apply to your practice or pharmacy

Note: All questions answered as **“not compliant”** require comments.

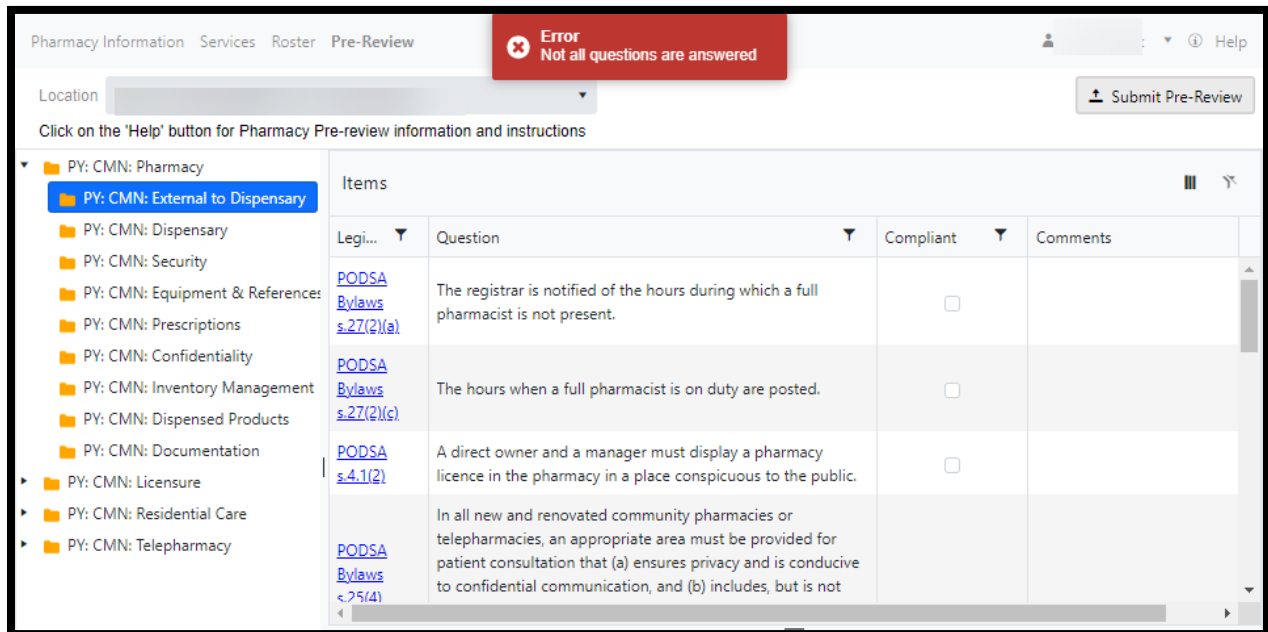
Use the following criteria to determine compliance:

- We do this well but inconsistently
- We do this well and consistently
- We do not do this (not applicable or must be started)
- We need to improve the way we do this (describe the changes to be made)

6. As you answer the questions, identify opportunities to make corrective changes:
 - Document any immediate corrective changes in the comments prior to submission. Continue to make corrective changes prior to the *Pharmacy Review*
 - Identify opportunities to make further corrective changes and discuss them with the CO during the *Pharmacy Review*
 - You may upload attachments to demonstrate compliance
7. Once you have answered all the questions, click the **“Submit Pre-Review”** button to submit the *Pharmacy Pre-Review*.



- The *Pharmacy Pre-Review* can only be **“Submitted”** once all the required information has been filled out
- If information is missing, an error message will appear



Pharmacy Information Services Roster Pre-Review Error
Not all questions are answered

Location Submit Pre-Review

Click on the 'Help' button for Pharmacy Pre-review information and instructions

Legi...	Question	Compliant	Comments
PODSA Bylaws s.27(2)(a)	The registrar is notified of the hours during which a full pharmacist is not present.	<input type="checkbox"/>	
PODSA Bylaws s.27(2)(c)	The hours when a full pharmacist is on duty are posted.	<input type="checkbox"/>	
PODSA s.4.1(2)	A direct owner and a manager must display a pharmacy licence in the pharmacy in a place conspicuous to the public.	<input type="checkbox"/>	
PODSA Bylaws c.25(4)	In all new and renovated community pharmacies or telepharmacies, an appropriate area must be provided for patient consultation that (a) ensures privacy and is conducive to confidential communication, and (b) includes, but is not	<input type="checkbox"/>	

- Once **“Submitted”**, the *Pre-Review* can no longer be edited and a Pharmacy Pre-Review Completion Report will be available on eServices under the “PRP” tab.

Pharmacy Pre-Review Categories

There are two mandatory Pharmacy Pre-Review categories: Pharmacy and Licensure. They are further divided into sub-tabs as below:

1. Pharmacy

- External to the Dispensary
- The Dispensary
- Security
- Equipment and References
- Prescriptions
- Confidentiality of Personal Health Information
- Inventory Management
- Dispensed Products
- Documentation

2. Licensure

- Pharmacy Manager’s Responsibilities
- Owner/Director Responsibilities

The screenshot shows the Pharmacy Pre-Review interface. At the top, there are navigation tabs: Pharmacy Information, Services, Roster, and Pre-Review. Below the tabs is a 'Location' dropdown menu and a 'Submit Pre-Review' button. A message reads: 'Click on the 'Help' button for Pharmacy Pre-review information and instructions'. On the left, a sidebar menu lists various categories, with 'PY: CMN: External to Dispensary' highlighted in blue. The main area contains a table with the following data:

Legi...	Question	Compliant	Comments
PODSA Bylaws s.27(2)(a)	The registrar is notified of the hours during which a full pharmacist is not present.	<input type="checkbox"/>	
PODSA Bylaws s.27(2)(c)	The hours when a full pharmacist is on duty are posted.	<input type="checkbox"/>	
PODSA s.4.1(2)	A direct owner and a manager must display a pharmacy licence in the pharmacy in a place conspicuous to the public.	<input type="checkbox"/>	
PODSA s.25(4)	In all new and renovated community pharmacies or telepharmacies, an appropriate area must be provided for patient consultation that (a) ensures privacy and is conducive to confidential communication, and (b) includes, but is not	<input type="checkbox"/>	

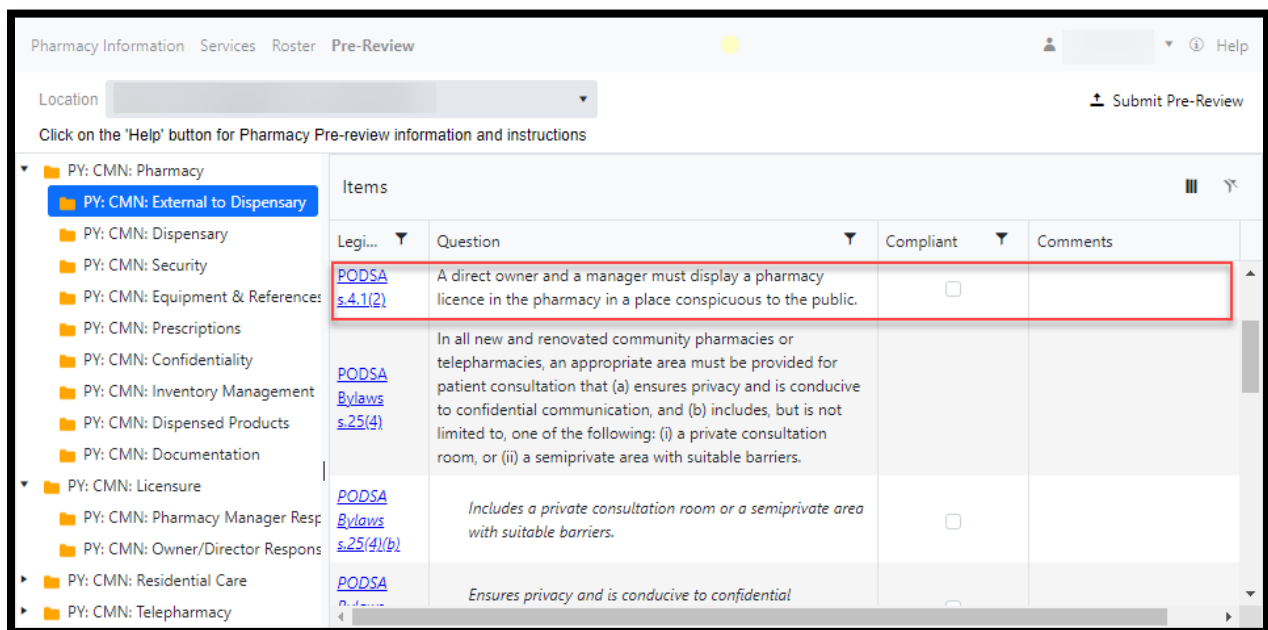
There are also optional Pharmacy Pre-Review categories that would only appear if they are applicable. Examples include: Residential Care, Compounding, Telepharmacy Services

External to Dispensary Example

(Click to link to legislation and standards)

- The legislation for displaying the College license is:
 - [PODSA Part 1 - 4.1\(2\)](#)

“A direct owner and a manager must display a pharmacy license in the pharmacy in a place conspicuous to the public.”



The screenshot shows a software interface for pharmacy pre-review. On the left is a navigation tree with categories like 'PY: CMN: Pharmacy' and 'PY: CMN: External to Dispensary'. The main area displays a table of items. The first item is highlighted with a red box:

Legi...	Question	Compliant	Comments
PODSA s.4.1(2)	A direct owner and a manager must display a pharmacy licence in the pharmacy in a place conspicuous to the public.	<input type="checkbox"/>	
PODSA Bylaws s.25(4)	In all new and renovated community pharmacies or telepharmacies, an appropriate area must be provided for patient consultation that (a) ensures privacy and is conducive to confidential communication, and (b) includes, but is not limited to, one of the following: (i) a private consultation room, or (ii) a semiprivate area with suitable barriers.		
PODSA Bylaws s.25(4)(b)	<i>Includes a private consultation room or a semiprivate area with suitable barriers.</i>	<input type="checkbox"/>	
PODSA Bylaws s.25(4)(a)	<i>Ensures privacy and is conducive to confidential</i>	<input type="checkbox"/>	

How Does the Pharmacy Manager Answer This Question?

- Click **"Compliant"** if:
 - The pharmacy license is displayed in the pharmacy in a place conspicuous to the public
- Do not click **"Compliant"** if:
 - The pharmacy license is not displayed in the pharmacy in a place conspicuous to the public



What Does the CO Do with This Information?

- The CO will have a record of the *Pre-Review* responses when they arrive at the pharmacy
- The CO will look for the pharmacy license to see if it is displayed in the pharmacy in a place conspicuous to the public
- The CO will then look at the *Pre-Review* response. If **“Compliant”** was not clicked and changes were to be made, the CO will confirm whether the changes have been made or not

Equipment and References Example

(Click to link to legislation and standards)

- The legislation for equipment is:
 - [Professional Practice Policy - 59 Pharmacy Equipment \(PPP-59\)](#)

"The dispensary of all community pharmacies at a minimum must have the following equipment..."
- The legislation for equipment is:
 - [Professional Practice Policy- 3 Pharmacy References \(PPP-3\)](#)

"All community pharmacies and telepharmacies at a minimum must have one of the following authorized library references in each of the categories listed..."

How Does the Pharmacy Manager Answer These Questions?

- Click "**Compliant**" if:
 - The specific equipment or reference is present and usable at the pharmacy
- Do not click "**Compliant**" if:
 - The specific equipment or reference needs to be purchased, fixed, or made usable at the pharmacy. The Pharmacy Manager will need to include the details of how and when the specific equipment or reference will be purchased, fixed, or refurbished as well as proof documents such as invoices, purchase orders or maintenance work orders



What Does the CO Do with This Information?

- The CO will have a record of the *Pre-Review* responses when they arrive at the pharmacy
- The CO will look for equipment and references at the pharmacy. They will determine if they are present and operational
- The CO will then look at the *Pre-Review* response. If **“Compliant”** was not clicked and changes were to be made, the CO will confirm whether the changes have been made or not



How does the College use the *Pharmacy Pre-Review*

- The *Pharmacy Pre-Review* provides the CO with an understanding of the current practice at the pharmacy prior to the Pharmacy Review;
- The CO confirms the accuracy of the answers submitted in the *Pharmacy Pre-Review*;
- The CO expects to see indicators of good practice for all *Pre-Review* questions where **“Compliant”** was clicked;
- The CO expects to see corrective changes and ongoing improvements for all *Pre-Review* questions where **“Compliant”** was not clicked;
- The CO independently reviews whether your pharmacy meets the expectations of the stated legislation during their visit

Pharmacy Manager's Responsibilities & Owner/Director Responsibilities

The questions in the Pharmacy Manager's Responsibilities and Owner/Director Responsibilities categories are directly linked to the following legislation:

(Click to link to legislation and standards)

- [**PODSA Part 2 – 11**](#)
 - A pharmacist named in a pharmacy license as Pharmacy Manager must personally manage and be responsible for the operation of the pharmacy
- [**PODSA Bylaws Part 2- 18 \(2\)\(a\)**](#)
 - The Pharmacy Manager must personally manage and be responsible for the daily operation of the pharmacy
- [**PODSA Bylaws Part 3- 24 \(1\)**](#)
 - A community Pharmacy Manager must establish and maintain written quality management policies and procedures
- [**PODSA Bylaws Part 2- 18 \(7\)\(b\)**](#)
 - A direct owner, directors and officers must ensure that the requirements to hold a pharmacy license under the Act are met at all times