

THE APOTHECARY

NEWSLETTER
SUMMER 2023 - nlpb.ca



VISION

Quality pharmacy practice and patient-centred healthcare through leadership and collaboration.

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The official newsletter of the Newfoundland & Labrador Pharmacy Board.

Registrants are responsible for reviewing all information within this publication.

MESSAGE FROM THE REGISTRAR— SUPPORTING PUBLIC PROTECTION

It has been a couple of weeks since the NLPB Board of Directors and I announced the approval of the 2024 Schedule of Fees and planned fee adjustment. The decision to increase fees was a difficult one to make and I know it was a difficult message to receive. It was not a decision the board took lightly but one that was deemed necessary after careful analysis of current operational costs, the schedule of fees, and budget forecasts. In addition to the impacts of inflation that we are all feeling at both a professional and personal level, the health regulatory environment has continued to grow and become more complex over the last several years, which has placed additional financial pressures on NLPB. These additional pressures have contributed to NLPB's current forecasted budgetary deficit of 15% and reduced reserve funds. In order to address this deficit and ensure NLPB is able to action its 2023-2026 Strategic Plan, the board recognized that the annual Consumer Price Index (CPI) fee adjustment, as per NLPB policy, would not be sufficient, and thus approved the additional 5% increase per year for the next three years. The board and I understand that this may have a significant impact on the budgets of both individual pharmacy professionals and pharmacy businesses, and our hope is that spreading the increase over a three-year period will make the negative financial impacts easier to manage by providing additional time for budget planning.



Although NLPB's accountability as a regulator is first and foremost to the public, as an organization whose primary revenue is generated by fees paid by registered pharmacy professionals and licensed pharmacies, we also have a responsibility to those we regulate to ensure we achieve our legislated requirements in a cost-efficient and fiscally responsible manner. Throughout this process my intention has been and continues to be that NLPB is transparent in its decision-making. As such, this issue of *The Apothecary* contains several articles designed to provide clarity regarding NLPB's responsibilities as a regulator (page 3) and insight into its operations and allocation of resources (page 5-6). Additionally, we have compiled the questions we have received from you over the last two weeks regarding the fee adjustment and provided responses in an FAQ, which can be found on pages 8-9.

I know that registered pharmacy professionals in this province have faced challenges in the past few years, with unprecedented demands on the health system. I commend you and have the highest respect for the significant healthcare contributions you make as you continue to remain accessible healthcare providers to meet your patients' healthcare needs. I would also like to thank you for providing your valuable feedback during our recent strategic planning process. NLPB heard from over 120 pharmacy professionals and key partner organizations during the process and the final plan reflects the feedback we received. To support you in continuing to provide safe and quality care to your patients, NLPB has developed a strategic plan for the next three years that focuses on working with you to address pharmacy practice challenges, with consideration given to such issues as practitioner wellness and working conditions, optimization of scope of practice, and efficiency and fairness in registration practices. I am excited to share NLPB's strategic goals and accompanying initiatives in the 2023-2026 Strategic Plan on pages 10-11 of this issue.

Also of note in the 2023-2026 Strategic Plan is NLPB's new Vision and Mission, updated to best reflect NLPB's goal for the future and role in achieving it. Each of the strategic goals were developed to align with NLPB's new vision of *quality pharmacy practice and patient-centred healthcare through leadership and collaboration* and its continued mission to protect the public by regulating the profession of pharmacy to ensure quality and ethical care. As we move forward with our work to see this vision realized, I look forward to doing so in collaboration with you, the pharmacy professionals instrumental in achieving it.

Sincerely,

Noelle Patten



SELF-REGULATION— RESPONSIBILITIES OF THE REGULATOR

As a self-regulated profession, pharmacy professionals have been entrusted by government to govern their own profession. All regulatory activities are delegated to a governing body responsible for serving and protecting the public's best interest. As the governing body for pharmacy in the province, the Newfoundland and Labrador Pharmacy Board (NLPB) is a not-for-profit organization that is wholly funded by the fees paid by registered pharmacy professionals. Registration renewal fees for pharmacists and pharmacy technicians and license renewal fees for pharmacies account for nearly 90% of all revenue for NLPB.

As per the *Pharmacy Act, 2012* (Act), NLPB is required to set fees and ensure that the amount of fees is sufficient to enable the completion of duties outlined in the Act. The duties under the Act are to be performed in service to NLPB's objects, which are listed in section 7(2) and are as follows:

- the promotion of high standards of practice, and continuing competency and quality improvement through continuing education;
- the administration of a registration and licensing program;
- the establishment, maintenance, and development of standards for the operation of pharmacies; and
- ensuring that the public interest is protected in all matters relating to the practice of pharmacy.

NLPB's operational responsibilities are outlined primarily in Part III – Part VI of the Act with additional requirements detailed in the *Pharmacy Regulations, 2014* (Regulations). Most duties fall in one of the four categories listed, Part III: Registration, Admission and Examination, Part IV: Practice, Part V: Discipline, and Part VI: Quality Assurance. NLPB's core business lines, Registration, Pharmacy Licensing, Pharmacy Practice, Quality Assurance, and Complaints and Discipline, align with these categories.

Resource Allocation

BUSINESS LINES

Each of NLPB's business lines require financial,

physical, technological, and human resources to ensure all required duties are performed and outcomes are achieved. The primary focus when allocating resources is determining the minimum necessary to deliver legislative requirements under each business line. To ensure that all resources are being used efficiently, NLPB employs its resources over multiple business lines, with several staff persons assigned to two or more portfolios to meet responsibilities using limited staff resources. NLPB's most significant resource is its staff, who are tasked with executing the operational plan and carrying out the duties under the Act.

During the external consultation for strategic planning in fall 2022, NLPB received feedback that registered pharmacy professionals were unclear on the role of NLPB staff members, why the current level of staff is needed, and how revenue generated from registration and licensing fees is spent. To better promote understanding, a list of operational activities and the associated resources for each business line is available on pages 5-6 of this issue, along with the approximated percentage of the total budget dedicated to each business line, as well as to administration, operation, and board expenses.

STRATEGIC GOALS & INITIATIVES

To fulfill its obligation to public protection, it is also the responsibility of NLPB to stay informed regarding national and provincial trends and challenges in pharmacy and healthcare. Any issues identified as impacting public health and safety as it pertains to pharmacy are considered when developing strategic goals and initiatives. Some of the initiatives in the current strategic plan were developed to address identified challenges for pharmacy professionals in practice environments and enable full scope of practice to provide the best possible care to patients. The goals and initiatives of the 2023-2026 Strategic Plan can be found on pages 10-11.

The strategic plan sets NLPB's strategic focus for a 3-to 4-year period and guides the allocation of resources to attain the strategic goals. Following



SELF-REGULATION— RESPONSIBILITIES OF THE REGULATOR

the setting of goals and initiatives, NLPB drafts an operational plan, which details the timeline, actions, and resources necessary to achieve the goals. The plan may dictate the reallocation of existing resources or the need for additional resources on either an ongoing or short-term basis depending on the nature of the initiative. As such, when the NLPB board commits to a strategic plan, they also commit to ensuring the annual budget provides for adequate funding to achieve the goals while also accounting for current operating costs.

Financial Management

OVERSIGHT

The Finance and Audit Committee (FAC) is a sub-committee of the board of directors that is responsible for overseeing the financial operation of the organization and making recommendations to the full board on related policies, investments, schedule of fees, and the annual budget. The Registrar & CEO is a non-voting member of the board who reports to the board and is responsible for the financial management of the organization. The Registrar provides quarterly financial performance reports to the FAC that compares actual expenses to the approved budget, highlighting variances and ways to manage them within the budget. The chair of the FAC provides an update on the committee's work at each board meeting, including a review of the quarterly financial report.

BUDGETING PROCESS

Starting mid-year, every expense line of the previous years' budget is reassessed and adjusted based on opportunities for reducing expenses, uncontrollable rising costs, and strategic initiatives planned for the upcoming year. The draft budget is scrutinized by the FAC, who then make a recommendation to the board regarding budget approval. While NLPB prepares budgets annually, strategic initiatives are identified on a 3-5 year basis so that resource implications can be forecasted and factored into the budget planning process.

MITIGATING RISK

Like other regulators, NLPB manages financial risk by maintaining reserve funds to cover variable or unforeseen costs and expenses. NLPB has both a Legal Reserve Fund and Operating Reserve Fund. The Legal Reserve Fund is designed to cover legal costs associated with complaints and discipline which exceed the annual operating budget provisions for those activities. The Operational Reserve Fund is designated to provide for extraordinary expenses that exceed or fall outside provisions of the operating budget to manage risk associated with cash flow fluctuations and to provide flexibility for new organizational priorities or unexpected organizational needs. Transfers from either of these funds must be approved by the NLPB board upon the recommendation of the FAC.

As per NLPB's current reserve policy, each reserve fund is to be maintained at 25% of the annual operating budget; a conservative amount when compared to many other provincial pharmacy regulatory authorities across the country. Currently, both legal and operating reserve funds are significantly below this target.

It is NLPB's responsibility to ensure that all financial and human resources are being used effectively and efficiently while ensuring we can accomplish our legislative requirements and achieve related strategic goals and objectives. As such, the board only considers fee adjustments when it is necessary for NLPB to remain financially sustainable. The recent decision of the board to increase fees was not one that was made lightly but was done so only after careful analysis and consultation. As we move forward, we will continue to identify opportunities for cost-savings and resource efficiencies as we carry out our legislated duties to regulate the practice of pharmacy in the best interest of the public.



NLPB OPERATIONS AND RESOURCE ALLOCATION

REGISTRATION AND LICENSING (15%)*

Duties

- Developing and maintaining registration and pharmacy licensing policies and procedures
- Processing applications, authorizations, and renewals
- Managing the online registration and licensing management system
- Responding to registration-related and pharmacy licensing-related inquiries
- Conducting opening, renovation, and relocation pharmacy assessments
- Developing and updating the NLPB registration exam and facilitating its administration
- Issuing letters of standing
- Maintaining public registers
- Reporting health human resources to provincial and federal government agencies

Resources

- Registration and licensing management system software
- Online learning portal
- Staff (2.225 positions)
 - Registration Administrator (1)
 - Office Administrator/Pharmacy Licensing Administrator (0.25)
 - Community Pharmacy Practice Consultant (0.25)
 - Hospital Pharmacy Practice Consultant (0.125)
 - Deputy Registrar/Director of Practice & Registration (0.35)
 - Director of Quality and Pharmacy Licensing (0.25)

PROFESSIONAL PRACTICE (10%)*

Duties

- Developing and reviewing standards, policies, and guidelines
- Managing the document review cycle
- Developing and presenting resources to support implementation of standards, policies, and guidelines
- Responding to questions regarding pharmacy practice and application of legislation, standards, policies, and guidelines
- Monitoring changes to national and other provincial practice environments
- Consulting on changes to relevant legislation

Resources

- Staff (0.875 positions)
 - Community Pharmacy Practice Consultant (0.25)
 - Hospital Pharmacy Practice Consultant (0.125)
 - Deputy Registrar/Director of Practice & Registration (0.5)

QUALITY ASSURANCE (QA) (10%)*

Duties

- Developing and evaluating QA programs
- Developing and maintaining a continuous quality improvement program
- Developing and managing professional development (PD) policies
- Developing processes for and conducting QA audits
- Supporting the QA Committee
- Developing self-assessment resources
- Developing processes and tools for pharmacy site visits
- Conducting and evaluating pharmacy site visits

Resources

- Staff (1.5 positions)
 - Community Pharmacy Practice Consultant (0.5)
 - Hospital Pharmacy Practice Consultant (0.25)
 - Director of Quality and Pharmacy Licensing (0.75)

*indicates approximate percentage of operating budget dedicated to the business line.



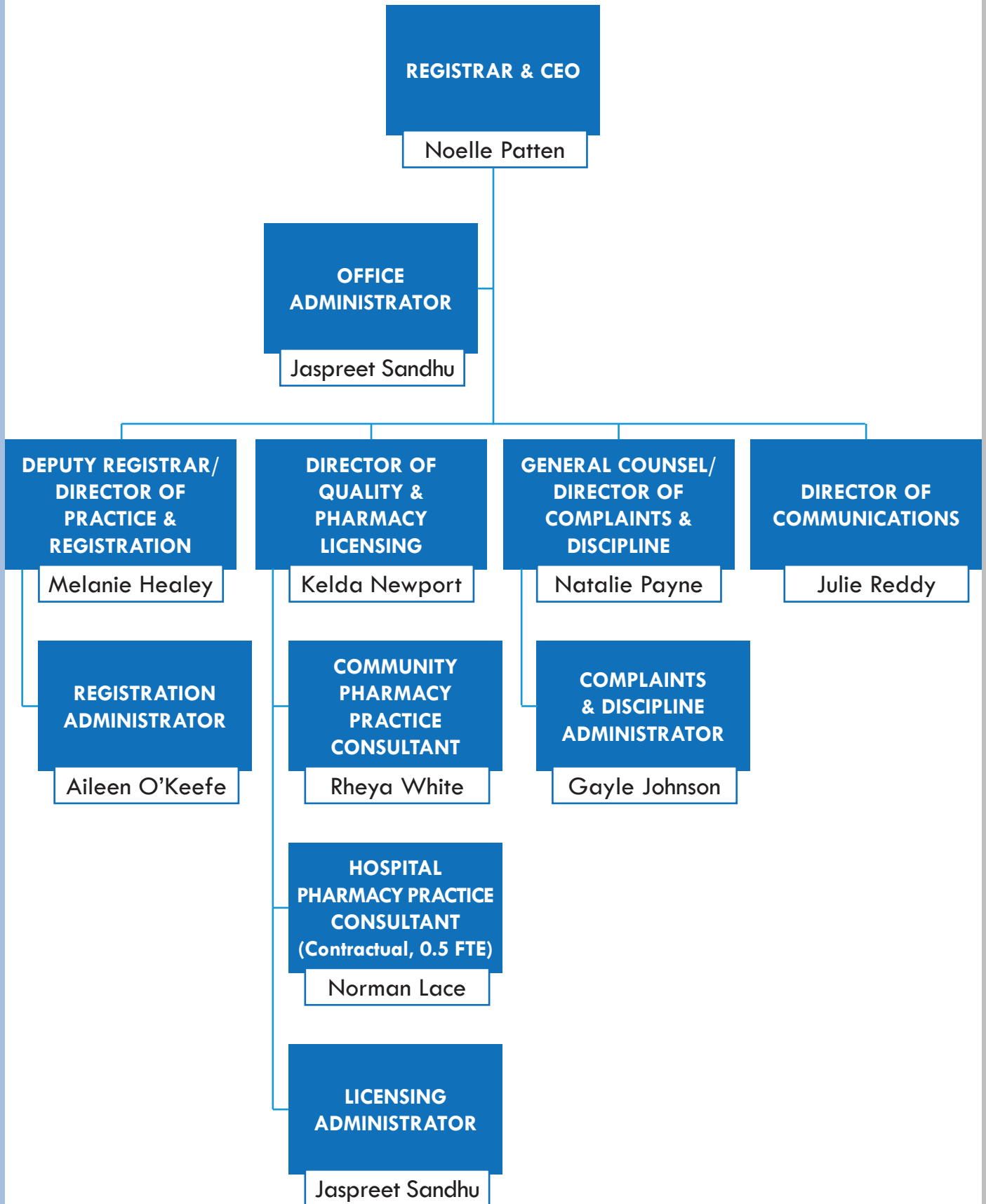
NLPB OPERATIONS AND RESOURCE ALLOCATION — CONTINUED

COMPLAINTS AND DISCIPLINE (15%)*	ADMINISTRATION, OPERATIONS, & BOARD (50%)*
<p><i>Duties</i></p>	<p><i>Duties</i></p>
<ul style="list-style-type: none"> • Receiving and documenting intake of inquiries and concerns related to pharmacy practice • Developing and maintaining the complaints and discipline policies and processes • Providing guidance to the public regarding the complaints and discipline process • Receiving and reviewing allegations • Processing complaints and coordinating correspondence • Contracting and supporting investigators • Overseeing litigation • Contracting and assisting external legal counsel • Managing disciplinary action • Supporting the Complaints Authorization Committee • Overseeing appointments of the disciplinary panel 	<ul style="list-style-type: none"> • Accounting and managing finances • Consulting on legislation and other legal issues • Organizing and facilitating board and committee meetings • Managing board and committee recruitment and elections • Managing general inquiries • Communicating, engaging, and consulting with the public, key partners, and registered pharmacy professionals • Developing and managing strategic goals and operational plans • Developing and maintaining online platforms, including website and social media accounts • Engaging with media and key partners • Oversight of all organizational activities and business lines (Registrar & CEO)
<p><i>Resources</i></p>	<p><i>Resources</i></p>
<ul style="list-style-type: none"> • Contracted investigators (as needed) • Contracted legal counsel (Discipline Panel) • CAC and Discipline Panel meeting expenses • Staff (1.5 positions) <ul style="list-style-type: none"> ◦ Complaints and Discipline Administrator (1) ◦ General Counsel/Director of Complaints & Discipline (0.5) 	<ul style="list-style-type: none"> • Contracted accounting and auditing services • Contracted IT and website support • Banking and other financial services • Insurance • Contracted facilitation and professional development services • Rent, utilities, and property management • Office supplies and equipment • Office and email software programs • Board expenses (including costs associated with travel and meeting attendance) • Staff (2.4 positions) <ul style="list-style-type: none"> ◦ Office Administrator/Pharmacy Licensing Administrator (0.75) ◦ Director of Communications (1) ◦ General Counsel/Director of Complaints & Discipline (0.5) ◦ Deputy Registrar/Director of Practice & Registration (0.15) • Registrar & CEO

*indicates approximate percentage of operating budget dedicated to the business line.



NLPB ORGANIZATIONAL CHART



NLPB FEE ADJUSTMENT— FAQ (questions received to date)

Q: What is CPI and how is it applied to fees?

A: According to Statistics Canada, CPI, or the Consumer Price Index, represents changes in prices experienced by Canadian consumers and is one of the most widely used measures of inflation. When NLPB fees are set each year for the upcoming year, the CPI that is applied is the average percentage change from the year prior. For example, the CPI applied to the 2024 Schedule of Fees is 6.8%, which was the annual average CPI increase in 2022. The [CPI portal](#) publishes the annual average change for the previous year at the beginning of each calendar year.

Q: Will registered pharmacy professionals have the opportunity to ask questions about the annual report and financial statements at the AGM?

A: The AGM will be open to all pharmacy professionals to attend either virtually or in person and there will be a Q&A immediately following. The time and location will be published at least two weeks in advance.

Q: Why are pharmacists required to be members of the association when that is not a requirement in other provinces?

A: Each province has its own set of legislative requirements for pharmacy professionals. The requirement for pharmacists to be members of the Pharmacy Association of Newfoundland and Labrador (PANL) is set in the *Pharmacy Act, 2012*; it is not a requirement assigned by NLPB. NLPB does not have the ability to change the requirement, as it would require a change to the provincial legislation at the discretion of the government. Last year NLPB was advised by government that the requirement for pharmacy and other health professionals to be members of their profession's advocacy body was under review.

Q: The annual renewal fee for pharmacists has increased by nearly 60% in the past 10 years, and for the past several years NLPB has been collecting additional revenue through pharmacy technician fees. How can you explain such an increase in operational costs that would cause

this increase in fees?

A: Over the past 10 years, we have seen much change in the profession, including broadening of scope of practice, a new class of pharmacy professionals, legislative changes resulting in increased responsibilities for NLPB, increased litigation, and increased complaints from the public. All of these changes has led to increased costs for resources, such as staffing, office space, legal, insurance, and information technology. For example, NLPB has had to double its staff in the past 10 years to meet current demands. In addition, NLPB has experienced the effects of inflation over the past decade and, just like other businesses, is currently experiencing a rise in general operational costs such as rent, utilities, and office supplies. While pharmacy technician registration is a new source of revenue for NLPB, these registration fees only represent about 10% of NLPB's annual revenue, and, as noted before, regulation of a new registration class also brings with it an increase in costs.

Q: Pharmacists in NL, on average, earn lower wages than many other provinces; has NLPB given any consideration to the fact that fees are increasing while pharmacists' wages are not?

A: NLPB does not have data on how the wages of pharmacy professionals in NL compare to that of other provinces in Canada and does not have influence over the wages of pharmacy professionals in this province. However, NLPB understands that the ratio of wages to fees is an important concern and that there are limits to how high the registration fees for pharmacy professionals can go. NLPB will continue to pay attention to this along with the fees of other pharmacy regulators in Canada with similar numbers of registered pharmacy professionals.

Q: Why are pharmacy technicians fees more than double the licensing fees of registered nurses?

A: In terms of comparison of NLPB's fees to that of other health regulators, each profession is regulated under different legislations, have their own unique requirements, and independently set their own fees. For example, pharmacy



NLPB FEE ADJUSTMENT— FAQ (questions received to date)

regulators are not only responsible for the regulation of pharmacy professionals but also for that of practice sites, which is not something that is required of other health regulators. As such, it is difficult to make cross-comparisons by profession. We primarily compare our fees to other pharmacy regulators across Canada, particularly those with a similar number of pharmacy professionals. Some of the factors which may impact regulatory fees are the requirements of the profession, the frequency and complexity of legal changes governing the profession, the size of the profession, and the number and complexity of complaints received.

Q: How are salary levels decided upon for NLPB staff, and how much oversight do members of the board or finance committee have in determining whether these amounts are fair, reasonable, and comparable to other pharmacists' salaries in NL?

A: In 2022, the NLPB board commissioned an external consultant to review NLPB staff salaries to ensure they were fair to both employees and the organization, and to demonstrate fiscal responsibility. The consultant used several evaluation tools and practices to establish compensation recommendations for the NLPB staff positions, including a review of current position descriptions, research of the labour market, analysis of Hay Job Evaluation benchmarks, comparator analysis of current pay rates and positions from similar boards and agencies, and review of the provincial government's existing classification system. The Hay Job Evaluation Method has four compensable factors: know-how, problem-solving, accountability, and working conditions. These factors, with the exception of working conditions, are used to determine the appropriate pay scales for all management positions in the public sector in NL. The consultant determined that these are the most appropriate scales to implement for NLPB staff positions. To validate the salary benchmarks, the evaluator reviewed the compensation of similar positions from other regulatory bodies, the public sector, and the labour market. The results of

the review were presented to the board for approval along with the annual budget upon recommendation of the finance and audit committee. Any new staff positions added in the future will be evaluated in a similar manner and assigned to an appropriate pay scale.

In terms of staffing, NLPB has 8 staff positions, 1 part-time contractual position, and the Registrar & CEO position. Three staff positions, the part-time contractual position, and the Registrar position are required to be held by pharmacists. The Registrar is an executive position and 2 of the staff pharmacists are in management roles that require additional education, experience, and/or skillsets in regulatory affairs and management. As such, it is difficult to make direct comparisons between NLPB's positions and that of other pharmacists practicing in the province.

Q: Now that remote work is more commonplace, has any consideration been given to reducing office space and having staff work mostly from home?

A: NLPB signed a 10-year lease agreement for its current office space in 2019, as the previous space did not meet accessibility requirements and was not suitable for the growing number of staff required to carry out NLPB's legislated duties. Currently, 6 years remain on the lease agreement. NLPB will be re-evaluating office space needs as the expiration of the contract nears. Rent for office space accounts for approximately 10% of NLPB's current operating budget.

Q: What is the board honoraria and when was it last reviewed?

A: NLPB's board of directors consists of volunteers who give of their time and expertise to support regulation of pharmacy in the public's best interest. NLPB has a finance policy for reimbursement of expenses acquired while representing or conducting the business of NLPB that is regularly reviewed, updated, and approved by the board. There is a specific honoraria for the board chair to compensate for the additional time and duties required of that position. This honoraria of \$2000 is paid once per year and has not increased for more than 10 years.



2023-2026 STRATEGIC GOALS

VISION

Quality pharmacy practice and patient-centred healthcare through leadership and collaboration.

MISSION

The Newfoundland and Labrador Pharmacy Board protects the public by regulating the profession of pharmacy to ensure quality and ethical care.

VALUES

ACCOUNTABILITY COLLABORATION
INTEGRITY RESPECT
TRANSPARENCY

1
GOAL

Support pharmacy professionals in providing quality care.

2
GOAL

Provide a supportive framework for error prevention.

3
GOAL

Improve access to health care through pharmacy services.

4
GOAL

Strengthen pharmacy professionals' and the public's trust in the regulatory process.



Strategic Initiatives

GOAL 1	Support pharmacy professionals in providing quality care	
	<i>Initiative</i>	<i>Targeted Completion</i>
	Update and implement the requirements and guidance for professional development.	2024
	Develop quality indicators for pharmacy practice.	2025
	Determine and implement a process for assessing individual pharmacy professionals' competency and practice.	2026
	Develop practice support guidance regarding diversity, equity, inclusion, cultural competency, and trauma-informed care.	2024
	Define NLPB's role in supporting pharmacy professionals' wellness and influencing working conditions that may impact quality and safety of patient care.	2024
GOAL 2	Provide a supportive framework for error prevention	
	<i>Initiative</i>	<i>Targeted Completion</i>
	Implement the continuous quality improvement and medication incident reporting program, MedSTEP NL.	2024
	Communicate error prevention and safety improvement strategies from aggregate data.	2026
GOAL 3	Improve access to health care through pharmacy services	
	<i>Initiative</i>	<i>Targeted Completion</i>
	Assess models for regulating non-traditional pharmacy practice sites.	2025
	Determine, in consultation with government and other key partners, next steps to optimize pharmacist and pharmacy technician scope of practice and develop a supporting regulatory framework.	2025
	Determine next steps to support the evolving practice environment and develop a supporting regulatory framework.	2026
	Review and revise registration processes with a focus on efficiency, fairness, and changing legislative requirements.	2026
GOAL 4	Strengthen pharmacy professionals' and the public's trust in the regulatory process	
	<i>Initiative</i>	<i>Targeted Completion</i>
	Review and revise complaints and discipline processes to improve efficiency and public accessibility.	2024
	Develop and implement a complaints and discipline communications framework.	2024
	Determine and develop a process to assess the effectiveness of complaints and discipline outcomes in improving practice and protecting the public.	2026
	Develop and implement an engagement strategy for NLPB's key partners.	2026
	Develop and implement an engagement strategy for pharmacy professionals.	2026
	Develop and implement an equity, diversity, and inclusion plan.	2026



2023-2026 STRATEGIC PLANNING— WHAT WE HEARD

In developing the 2023-2026 Strategic Plan, it was important to all board and staff involved in the process that the decision-making regarding the strategic direction of NLPB was well-informed. As such, prior to engaging in strategic planning, NLPB initiated an external consultation, including a survey of registered pharmacy professionals and focus group sessions with several key partners, such as government, educators, and advocacy groups, which provided valuable feedback to inform the development of the strategic plan. The feedback was compiled by an external facilitator and presented to the board and staff over the course of two planning sessions, which took place in November 2022 and February 2023. The following is a summary of the key learnings taken from this feedback and how it informed the final plan.

Quality pharmacy practice and patient-centred healthcare through leadership and collaboration.

NLPB's Vision and Mission

Many respondents indicated that although the mission accurately reflects the work of NLPB, the vision does not, with some questioning if in fact NLPB's role was to advance pharmacy care. The board and staff reviewed the current vision, *advancing pharmacy care for a safe and healthy community*, with this feedback in mind and determined that a new vision should be crafted to better reflect NLPB's vision for the future of pharmacy care as it relates to its role in protecting the best interest of the public. As such, NLPB's new vision is, *quality pharmacy practice and patient-centred healthcare through leadership and collaboration*.

Some respondents also questioned the use of a "mandate" to express NLPB's purpose and noted the negative connotations associated with this terminology. Reflecting on this feedback, the board agreed that a mandate statement is not necessary and instead reference should be made to the objects of NLPB as stated in the *Pharmacy Act, 2012*.

NLPB's Goals and Priorities

The feedback received regarding NLPB's 2020-2022 strategic goals was key to informing the goals that would be set out in the 2023-2026 Strategic Plan.

Most respondents indicated that optimizing full scope of practice was still an important goal for NLPB to set in the current healthcare environment, especially as it relates to pharmacy professionals' ability to provide patient care and assist a struggling health care system. With this feedback in mind, the board set an overarching goal to *improve access to health care through pharmacy services*, which will address the optimization of scope of practice for pharmacists and pharmacy technicians, as well as support the evolving practice environment.

Operationalizing quality assurance initiatives was also identified as an important goal that should continue to be expanded upon in the next strategic plan. Pharmacy professionals indicated that they could see much work had been done in quality assurance, but concerns were raised regarding whether the current initiatives were addressing pharmacy professionals' competence and ensuring patients receive safe and quality care.

As a result, two of the four goals set out in the 2023-2026 Strategic Plan focus on supporting quality. The first, *support pharmacy professionals in providing quality care*, addresses competency with initiatives that focus on assessing individual pharmacy professionals' competency and practice and updating professional development requirements. This goal also includes the initiative to develop practice support guidance for diversity, equity, inclusion, cultural competency, and trauma-informed care. Staffing and workload challenges were also identified by many respondents as having the potential to affect quality of care. As such, NLPB will be working to define and action its role in supporting pharmacy professionals' wellness and influencing working conditions that may impact quality and safety of patient care. The second goal related to quality improvement is, *provide a supportive framework for error prevention*, which



2023-2026 STRATEGIC PLANNING— WHAT WE HEARD

focuses on the specific quality initiative of continuous quality improvement and medication incident reporting to support pharmacy professionals in proactively assessing risk, learning from incidents, and implementing measures that improve safety.

Ensuring effective communications was noted by many respondents as a goal that is both necessary and needed improvement. Upon review of the feedback provided by both pharmacy professionals and key partners, the board noted that there is often a lack of awareness and understanding regarding the role and responsibilities of the regulator and effective communications is needed to provide clarity. Several respondents felt that more effective communications as well as increased transparency could contribute to a better relationship between NLPB and pharmacy professionals. Others also noted that improved communications could result in stronger relationships with key partners, such as government, which may lead to more collaboration on pharmacy practice and health system issues. This feedback served to inform NLPB's final goal in the 2023-2026 Strategic Plan, *strengthen pharmacy professionals' and the public's trust in regulatory processes*, which includes the development of engagement strategies for both pharmacy professionals and NLPB's key partners.

Lastly, several comments were received regarding the justification of fees along with requests for fees to be lowered, citing that NLPB fees were disproportionately higher than other jurisdictions in Canada. Unfortunately, lowering fees was not possible and the board needed to increase fees for NLPB to remain financially stable while carrying out its regulatory duties. However, in response to this feedback, NLPB conducted an updated jurisdictional review of fee schedules to ensure fees remained within an appropriate range and shared this with pharmacy professionals. We have also been shifting communication practices to increase transparency and provide clarity regarding our role in the pharmacy profession. Through consultation, many issues and opportunities have been identified as important

to both pharmacy professionals and NLPB with respect to the provision of care to the public. NLPB is committed to supporting pharmacy professionals in providing safe and quality care to their patients and achieving the goals set out in the 2023-2026 Strategic Plan. These goals, as well as NLPB's operational responsibilities as outlined on page 4-5, require resources to achieve and can only be actioned by setting the appropriate fees. With that said, NLPB will continue to identify and pursue cost-saving opportunities to ensure the revenue generated by fees is being used effectively and efficiently.

Thank you to everyone who participated in the external consultation, your feedback was vital to the development of the 2023-2026 Strategic Plan and in guiding the profession forward in the best interest of the public it serves. Stay tuned and let's keep this conversation going!



BOARD MEMBERS

EXECUTIVE COMMITTEE

CHAIR

Taggart Norris

VICE CHAIR

Henry White

EXECUTIVE MEMBER

Jason Ryan

PUBLIC REPRESENTATIVES

BOARD-APPOINTED

Terry Foss
Mark Sheppard

GOVERNMENT-APPOINTED

Currently Vacant
Currently Vacant

NON-VOTING

REGISTRAR

Noelle Patten

ELECTED MEMBERS

ZONE 1 PHARMACIST

Amy Randell

ZONE 2 PHARMACIST

Jason Ryan

ZONE 3 PHARMACIST

Jennifer Godsell

ZONE 4 PHARMACIST

Henry White

ZONE 5 HOSPITAL PHARMACIST

Nicole Kennedy

ZONE 6 PHARMACY TECHNICIAN

Jillian Thorne

ZONE 7 AT-LARGE PHARMACISTS

Timothy Buchanan
Taggart Norris

DEAN, MEMORIAL UNIVERSITY SCHOOL OF PHARMACY

Shawn Bugden

If you are a pharmacist that is dedicated to quality & safe healthcare and are interested in supporting your profession in the public's best interest, We Need You!

A second call for nominations for board representatives in Zone 5 (Hospital Pharmacist) and Zone 7 (At-Large Pharmacists) is open now until July 30, 2023.

Check out the [NLPB website](#) for more information and to download a nomination package.



BOARD MEETING UPDATE

On June 2, the NLPB Board of Directors gathered for a meeting in St. John's.

Updates to Standards & Guidelines

The addition or revision of several documents, including the [Interpretation Guide - Maintaining Professional Boundaries](#), the Standards of Practice for CQI and MIR and corresponding implementation plan, and the [Standards of Practice - Medical Assistance in Dying](#), were approved at this meeting.

Interpretation Guide - Maintaining Professional Boundaries

In undertaking the development of these guidelines, a cross-country jurisdictional scan was conducted and language from other provinces was reviewed and considered. The development of the guidelines focused on identifying the sections of the Code of Ethics specific to professional boundaries that should be considered by a pharmacy professional when providing services to someone with whom they have an existing relationship or when considering beginning a personal relationship with someone to whom they are providing health care services. The Interpretation Guide has been posted to the [NLPB website](#).

Standards of Practice for Continuous Quality Improvement (CQI) and Medication Incident Reporting (MIR)

In August 2022, the board adopted the [NAPRA Model Standards for Continuous Quality Improvement and Medication Incident Reporting](#) in principle for the purpose of developing standards of practice (SOP) and a CQI program, MedSTEP NL. A task force was struck and operationalized in February 2023, and members were presented with the SOP and implementation plan for community pharmacies for review and feedback. Both documents were also presented to ISMP Canada, NAPRA's CQI and MIR information sharing group, and the Regional Director of Pharmacy Services with the health authority for review and to provide feedback. Feedback was compiled and integrated into the documents. Upon recommendation of the task force, the SOP and implementation plan for community pharmacies were presented for

approval at the most recent meeting of the board. Both documents were approved and will be published to the NLPB website later this summer.

Standards of Practice - Medical Assistance in Dying

The review of these standards was undertaken following a request from the health authority to review of the role of pharmacy technicians in the hospital setting in relation to the release of MAID medications. Following a jurisdictional scan, it was noted that in several other provinces with comparable documents, pharmacy technicians are permitted to release medications for MAID under certain conditions. Taking into consideration the standardized nature of the process, in particular in the preparation of the kits, the board approved the revision to section 3.4 of the standards to allow for the release of medications for MAID by a pharmacy technician collaborating with a pharmacist in a hospital setting. A pharmacist is required to provide all pertinent information to the prescribing physician or nurse practitioner prior to the release, and to be available to answer any questions they might have when they are picking up the medications. The revised standards have been posted to the [NLPB website](#).

2022 Audited Financial Statements

The 2022 audited financial statements were reviewed and approved by the board. The statements are available for public viewing in the [2022 Annual Report](#) on the NLPB website. The annual report will be presented in its entirety at the Annual General Meeting later this year.

2024 Schedule of Fees

As previously communicated, following the recommendation of the Finance and Audit Committee, the board approved a CPI + 5% increase to the NLPB Schedule of Fees each year for 3 years, starting in 2024.

Board Appointment

Following a call for expression of interest, Terry Foss was appointed as a board-appointed public representative, effective June 3, 2023.



PROFESSIONAL LIABILITY INSURANCE— THE IMPORTANCE OF DOCUMENTATION

As an error in pharmacy care can lead to devastating consequences for patients, professional liability insurance (PLI) is an important public protection issue, which is why carrying sufficient PLI is a requirement for all pharmacy professionals registered in Newfoundland and Labrador. In healthcare professions, such as pharmacy, PLI is designed to protect both the professional and the patient should accidents, errors, or omissions occur that can or do cause harm to the patient. For the patient, it is essential that their pharmacy care provider has sufficient PLI coverage to ensure they are fully supported in the event of a medication or patient counselling error that causes harm. For pharmacy professionals, if you do not have an active PLI policy when such an error occurs, you may be held personally liable for patient harm and financial damages resulting from errors or malpractice, which can be significant. In addition, you may cause further undue suffering to the patient affected by the error if a lack of financial resources results in them being unable to access the support and resources they need.

As members of a self-regulating profession, pharmacy professionals must take personal responsibility to maintain adequate PLI coverage. As the regulating body for pharmacy practice in the province, it is the Newfoundland and Labrador Pharmacy Board's (NLPB) responsibility to ensure that all registered pharmacy professionals carry continuous and sufficient PLI. As such, NLPB requires registered pharmacy professionals to submit their annual insurance certificate upon registration and upon renewal of the policy as proof of sufficient coverage. To ensure this requirement, as well as all requirements outlined in the [NLPB PLI Requirements for Registration](#), are met, NLPB conducts annual PLI audits.

2022 PLI Audit

In 2022, pharmacy professionals used NLPB's new registrant and licensing management system to renew their registration, which required documenting PLI information in addition to uploading a current PLI certificate. The additional documentation requirement provided NLPB with an efficient method for auditing all PLI records rather than only a sample of records. This year's audit occurred in multiple

phases and involved reconciling policy certificates with the information provided by pharmacy professionals. Pharmacy professionals' current PLI policy certificates were compared to the certificates on file from the previous year's renewal to assess whether minimum PLI coverage requirements were met and whether coverage was continuous. Using the new system, NLPB was able to quickly generate a report of all PLI records, allowing for a thorough audit and providing a strong baseline for compliance moving forward.

RESULTS

An initial report of all records showed significant documentation issues. All registered pharmacy professionals were notified of the issues and given a period of two weeks to ensure all missing information was submitted. Following this deadline, NLPB reconciled PLI records with outstanding issues, resulting in the identification of 81 pharmacy professionals who did not meet requirements following phase 1 of the PLI audit. These individuals were contacted directly via email and given a period of two weeks to provide additional information or corrective action. Following phase 2 of communications, 33 pharmacy professionals continued to not meet requirements. These individuals were contacted directly by phone to request additional information regarding their PLI coverage. Following phase 3 of communications, a final review was conducted, which resulted in a total of 9 referrals to complaints and discipline.

Due to the significant number of issues identified following the initial report, NLPB was compelled to allocate significant human resources to complete the audit process and ensure that all registered pharmacy professionals held sufficient coverage. Although less than 1% of registered pharmacy professionals were ultimately referred to complaints and discipline, NLPB staff were unable to identify the individuals with inadequate or gaps in coverage until all registered pharmacy professionals provided the correct and up-to-date information and documentation. This process serves to highlight the importance of maintaining an up-to-date record of your PLI information and documentation in the NLPB Registrant Portal.



PROFESSIONAL LIABILITY INSURANCE— THE IMPORTANCE OF DOCUMENTATION

Updates to PLI Requirements

As a measure to better ensure PLI requirements are met, NLPB recently implemented changes to the PLI Requirements for Registration that create a dual onus on the individual pharmacy professional and the pharmacist-in-charge to ensure all registered employees' PLI policies are up to date. Registered pharmacy professionals are required to review the updated [Professional Liability Insurance Requirements for Registration Interpretation Guide](#) and ensure the changes are implemented no later than September 30, 2023.

Registered pharmacy professionals are reminded of the following requirements:

- **PLI is a requirement to be registered as a pharmacy professional, whether you are actively practicing or not**, such as in the case of maintaining registration while on parental leave. Registered pharmacists, pharmacy technicians, pharmacy students and pharmacy interns are required to have continuous PLI coverage in a form and amount satisfactory to NLPB, as outlined in the registration and renewal sections of the *Pharmacy Act, 2012* and the *Pharmacy Regulations, 2014*.
- **PLI policies must be personal insurance** – that which names the registered pharmacy professional personally and covers them for all aspects of their practice and in all locations in the province in which that practice occurs.
- The policy must meet the minimum limit of coverage of \$2,000,000 per claim or per occurrence and \$4,000,000 annual aggregate.
- **PLI policies must include an auto-reporting clause** where the insurer will notify NLPB if the policy is cancelled, expires, or ceases to meet the criteria set by NLPB. PLI policies must also include a clause ensuring that the PLI policy will continue in force until the required notice is provided to NLPB. If NLPB receives this notice from your insurer and you are still registered to practice, NLPB will remind you that you must stop practicing immediately until you have an appropriate PLI policy in place. **It is your responsibility to ensure that the auto-reporting provision is added to your PLI policy at your next renewal or before**

September 30, 2023, at the latest.

- An annual certificate of coverage from the insurer is required to confirm that the PLI policy meets the criteria set by NLPB. Registered pharmacy professionals are expected to have a copy of their current liability insurance certificate uploaded to the Registrant Portal and readily accessible at all times.
- Registered pharmacy professionals must provide a copy of their annual certificate of coverage to the pharmacist-in-charge within 30 days of the policy start or renewal date, to be kept on file at the pharmacy at which they practice. Registered pharmacy professionals who practice as relief must **present a copy of their annual certificate of coverage to the pharmacist-in-charge at any pharmacy where they are working** at least once per coverage year.
- Pharmacists-in-charge will be asked to provide a declaration during the pharmacy license renewal process that they have confirmed that all pharmacy staff have valid PLI policies and that copies are kept on file at the pharmacy. This declaration will be added to this year's renewal for 2024.

TIPS FOR MEETING PLI REQUIREMENTS

- Set a regular reminder in your calendar on or before your policy renewal date to update your PLI information in the Registrant Portal.
- Do not assume your employer will renew your PLI for you. It is your responsibility to ensure PLI requirements are met. If your employer changes, check with your new employer to ensure PLI is in place.
- Provide your insurer with a copy of the [NLPB Professional Liability Insurance Requirements for Registration Interpretation Guide](#) to check to ensure your policy meets NLPB requirements.
- Refer to the [NLPB Registrant Portal User Guide - Adding/Updating Professional Liability Insurance](#) for instructions on updating your PLI in the Registrant Portal.



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