Revisions to the bylaws of the College of Physicians and Surgeons of Saskatchewan replace the Triplicate Prescription Program with the Prescription Review Program and revise the Program’s requirements. It continues as a partnership between this College, the College of Physicians and Surgeons of Saskatchewan and the College of Dental Surgeons of Saskatchewan, who will also similarly amend their bylaws. The Saskatchewan Registered Nurses’ Association has been added as a partner in anticipation that Registered Nurse (Nurse Practitioners) will be granted prescribing privileges under the federal Controlled Drugs and Substances Act. The complete text of this new bylaw is attached, and the Program requirements are summarized as follows:

1) The list of drugs covered by the Program is expanded to include all amphetamines (rather than just dextroamphetamine), anabolic steroids, all barbiturates (rather than just butalbital), benzodiazepines, chloral hydrate and gabapentin;

2) Prescribers are no longer required to write prescriptions for any of these drugs on the special triplicate (or duplicate) form*;

3) While under federal law many of these drugs can be prescribed verbally, the written prescription requirement continues for all drugs under new Program, including those that have been added;

4) “A statement that the prescription is only valid for three days” has been deleted from bylaw 18.1 of the College of Physicians and Surgeons and is no longer required on prescriptions. This means that the 3 day rule is eliminated and pharmacists may fill prescriptions at any time subject to professional judgment; however if the physician indicates on the prescription that it is only valid for 3 days and it is in their own handwriting then the 3 day rule is to be honored.

5) The prescriber must include on the prescription:
   a) The patient’s date of birth;
   b) The patient’s address;
   c) The total quantity of medication prescribed, both numerically and in written form;
   d) the patient’s health services number; and,
   e) the prescriber’s name and address

   Note: The exception is if the physician provides the prescription directly to the pharmacy via electronic prescribing, FAX or who transmits a prescription in accordance with the policies and protocols of the Pharmaceutical Information Program, need not include both the quantity numerically and in written form (as per CPSS Bylaw 18.1(e))

6) Prescribers may order part-fills for narcotics, but must specify the total quantity, the amount to be dispensed each fill, and the time interval between fills;

7) Prescribers may issue refills as permitted under federal law. To summarize, prescription refills are NOT permitted for any Narcotic, but are permitted under the Program when issued in writing for:
   a) Controlled Drugs Level I and II, including Preparations, if the prescriber has specified the number, and frequency or interval between, refills,
b) Benzodiazepines, if the prescriber has specified the number of refills and less than one year has elapsed since the date the prescription was issued. If the prescriber also specifies the interval between refills, the pharmacist may not dispense the refill until the interval has expired.

c) Chloral hydrate and gabapentin if the prescriber has specified the number of refills.

8) The Registrar’s office of the College of Physicians and Surgeons is authorized to collect and use the information gathered under the Program for the purposes of the Program (i.e. to generate “alert” and “explain” letters to physicians) and may disclose dispensing information to us.

9) While the one prescription per form rule is eliminated, prescribers are encouraged to write only one drug per prescription.

10) All other requirements of the former Triplicate Prescription Program are retained. In particular for drugs monitored under the Program:
   a) All prescriptions for Saskatchewan residents must be transmitted to the Drug Plan for capture and/or adjudication;
   b) The Program does not apply to orders issued in licensed special-care homes; and,
   c) Prescriptions issued at hospital emergency or outpatient department are subject to the Program requirements.

The Saskatchewan College of Pharmacists continues to expect member cooperation with prescribers to ensure the success of the Program.

* This also means that the patient’s signature on the prescription is eliminated, but members may ask for it at your discretion.
18.1 The Prescription Review Program
   (a) Panel of Monitored Drugs – The Prescription Review Program shall apply to all dosage
       forms of the following drugs, except where indicated otherwise:

       ACETAMINOPHEN WITH CODEINE - in all dosage forms except those containing 8
       mg or less of codeine
       ACETYLSALICYLIC ACID (ASA) WITH CODEINE - in all dosage forms except those
       containing 8 mg or less of codeine
       AMPHETAMINES - in all dosage forms
       ANABOLIC STEROIDS
       ANILERIDINE - in all dosage forms
       BARBITUATES
       BENZODIAZEPINES – in all dosages and forms
       BUPRENORPHINE – in all dosages and forms
       BUTALBITAL - in all dosage forms
       BUTALBITAL WITH CODEINE - in all dosage forms
       BUTORPHANOL
       CHLORAL HYDRATE
       COCAINE - in all dosage forms
       CODEINE - as the single active ingredient, or in combination with other active
       ingredients, in all dosage forms except those containing 20 mg per 30 ml or less of
       codeine in liquid for oral administration
       DIETHYLPROPION - in all dosage forms
       FENTANYL - in all dosage forms
       GABAPENTIN – in all dosages and forms
       HYDROCODONE - DIHYDROCODEINONE - in all dosage forms
       HYDROMORPHONE - DIPHRYDROMORPHONE - in all dosage forms
       LEVORPHANOL - in all dosage forms
       MEPERIDINE - PETHIDINE - in all dosage forms
       METHADONE - in all dosage forms
       METHYLPHENIDATE - in all dosage forms
       MORPHINE - in all dosage forms
       NORMETHANDONE-P-HYDROXYEPHEDRINE - in all dosage forms
       OXYPHEDRINE - as the single active ingredient or in combination with other active
       ingredients in all dosage forms
       PANTOPON - in all dosage forms
       PENTAZOCINE - in all dosage forms
       PHENTERMINE - in all dosage forms
       PROPOXYPHENE - in all dosage forms

   (b) Prescriptions for drugs covered by the Prescription Review Program shall be issued by
       physicians according to the policies and procedures agreed to and amended from time
       to time by the College of Dental Surgeons of Saskatchewan, the College of Physicians
       and Surgeons of Saskatchewan, the Saskatchewan Registered Nurses Association and
       the Saskatchewan College of Pharmacists.

   (c) In order to prescribe a drug to which the Prescription Review Program applies,
       physicians shall complete a written prescription which meets federal and provincial legal
       requirements and includes the following:
       (i) The patient’s date of birth;
       (ii) The patient’s address;
(iii) The total quantity of medication prescribed, both numerically and in written form;
(iv) The patient’s health services number; and,
(v) The prescriber’s name and address.

d) For the purpose of this bylaw, “written prescription” includes an electronic prescription that meets the requirements for electronic prescribing under the Pharmaceutical Information Program.

e) A physician who prescribes a drug to which the Prescription Review Program applies, and who provides the prescription directly to a pharmacy by electronic prescribing, by email or by FAX, or who transmits a prescription in accordance with the policies and protocols of the Pharmaceutical Information Program, need not include both the quantity numerically and in written form.

f) If a physician is registered on the Educational Register, the physician shall, in addition to the information in paragraph (c) above, include the following in a prescription for a drug to which the Prescription Review Program applies:
   (i) The training level of the physician writing the prescription;
   (ii) The legibly printed name of the Most Responsible Physician (the physician to whom queries regarding the prescription should be addressed);
   (iii) The legibly printed name of the physician writing the prescription.

f) Physicians shall only prescribe part-fills of medications to which the Prescription Review Program applies if the following information is specified in the prescription:
   (i) The total quantity;
   (ii) The amount to be dispensed each time; and
   (iii) The time interval between fills.

h) The office of the Registrar may gather and analyze information pertaining to the prescribing of medications to which the Prescription Review Program applies in Saskatchewan for the purpose of limiting the inappropriate prescribing and inappropriate use of such drugs. In order to fulfill that role, the office of the Registrar may, among other activities:
   (i) Generally, provide education to physicians in order to encourage appropriate prescribing practices by physicians registered by the College;
   (ii) Alert physicians to possible inappropriate use of medications to which the Prescription Review Program applies by patients to whom they have prescribed such drugs;
   (iii) Alert physicians to possible inappropriate prescribing of medications to which the Prescription Review Program applies;
   (iv) Make recommendations to a physician with respect to the physician’s prescribing of medications to which the Prescription Review Program applies;
   (v) Require physicians to provide explanations for their prescribing of medications to which the Prescription Review Program applies. In making requests for explanations, the office of the Registrar may require the physician to provide information about the patient, the reasons for prescribing to the patient, and any knowledge which the physician may have about other narcotics or controlled drugs received by the patient;
   (vi) Cause information, concerns or opinions of general application to the profession to be communicated to the physicians registered by the College without identifying the particular physician to whom such information relates;
   (vii) Provide information gathered in connection with the Prescription Review Program to another health professional body including the College of Dental Surgeons of Saskatchewan, the Saskatchewan College of Pharmacists or the Saskatchewan...
Registered Nurses Association, provided the information gathered is required by that body to perform and carry out the duties of that health professional body pursuant to an Act with respect to regulating the profession. Where the personal health information relates to a member of the health professional body seeking disclosure, disclosure by the Registrar of that information may only be made in accordance with The Health Information Protection Act, and in particular section 27(5) or that Act.

(i) Physicians shall respond to such requests for explanation, as described in paragraph (h)(v) above, from the office of the Registrar within 14 days of receipt of such a request for information.

(j) The Registrar, Deputy Registrar, or Prescription Review Program Supervisor may extend the deadline for reply at their discretion, upon receipt of a written request for extension from the physician.

(k) All physicians who receive such a request for information will comply, to the best of their ability, fully and accurately with such requests for information.

(l) Failure to comply with paragraphs (h)(v), (i) and (k) above is unbecoming, improper, unprofessional or discreditable conduct.

(m) Members shall keep a record of all drugs to which the Prescription Review Program applies that are purchased or obtained for the member's practice and a record of all such drugs administered or furnished to a patient in or out of the physician's office, showing:

(i) the name, strength and quantity of the drug purchased or obtained;
(ii) the name, strength, dose and quantity of the drug administered or furnished;
(iii) the name and address of the person to whom it was administered or furnished, and, if applicable, the name and address of the person who took delivery of the drug; and
(iv) the date on which the drug was obtained and the date(s) on which the drug was administered, furnished or otherwise disposed of.

(n) The record referred to in paragraph (m) shall be kept separate from the patient's medical record.

Note: The above bylaw 18.1(e) allows physicians to send prescriptions via email however, SCP does not allow for prescriptions to be sent via email therefore prescriptions sent via this method are not valid.