



## Administration of Drugs by Injection Supplementary Guidelines for Pharmacists

### GLOSSARY OF ACRONYMS/TERMS

PAS – the Pharmacy Association of Saskatchewan

PIP – Pharmaceutical Information Program

SIM – Saskatchewan Immunization Manual (accessed January 24, 2016)

SIMS – Saskatchewan Immunization Management System decommissioned in February 2015

Panorama – since February 2015 replaces SIMS

This document supplements the “[Administration of Drugs by Injection and Other Routes – Guidelines for Pharmacists](#),” originally dated August 2015 and revised November 2016. It also updates our memo to members and others of October 5, 2015.

In that memo, we recommended that members defer the administration of vaccines other than the publically funded flu vaccine until we are able to reconcile legal, policy, compensation and other issues with our Solicitor, the Ministry of Health and PAS. Most of that has occurred to the extent we are able to release this supplementary policy. It provides additional information to paragraph “7. Implementation” of the August 2015 policy document mentioned above.

This statement has been prepared in the context of our policy to collaborate with the public health system. SIM Chapter 2 states in part:

*“1.3 Provision of Publicly Funded Immunizations by Community Vaccine Providers that are not Registered Nurses*

*Community vaccine providers may include physicians, pharmacists, licensed practical nurses and emergency medical technicians (paramedics) who work within their legislated professional scope of practice. Community vaccine providers will:*

- *Follow the SIM guidelines for immunization.*
- *Ensure that vaccines maintain their potency (optimal transportation, storage, handling, and conservation), and report any cold chain breaks to the local health unit within one (1) working day.*
- *Meet regional reporting requirements related to clients being immunized with publicly-funded vaccines.*
- *Report all adverse events following immunization to the local health unit as soon as possible. For more information, refer to SIM, Chapter 11, Adverse Events Following Immunization.”*

## **A. IMMUNIZATION**

### **Influenza Immunization**

PAS and the Saskatchewan Ministry of Health have reached agreement on pharmacist participation in the 2015-16 publicly-funded annual seasonal influenza immunization program (referred to as the Drug Plan IIP). The Ministry provides publicly funded influenza vaccine to pharmacies at no cost under the Drug Plan IIP. When the Program's requirements are met, the Ministry also pays pharmacies for each vaccination administered by a pharmacist with Advanced Method Certification. Payment to pharmacies under this Program is included in the Pharmacy Proprietor Agreement.

Pharmacists or pharmacies shall not require or permit patients to make any payments for the supply or administration of publicly funded influenza vaccine under the Drug Plan IIP. Such payments constitute double-billing and/or surcharges for publicly-funded health services and are not permitted under applicable laws.

### **Other Vaccines**

#### **Immunizations which are publicly-funded either universally or under certain criteria:**

Where a patient meets the eligibility criteria to obtain a vaccination paid for by the Ministry, the pharmacist must advise the patient of their eligibility for publicly funded vaccine. The pharmacist must advise the patient that the vaccination can be received free of charge from public health in a Regional Health Authority (RHA). The pharmacist must also advise the patient of the charges for the supply and administration of the vaccination, and that the patient will not be reimbursed by the Ministry for such charges.

#### **Vaccinations which are not publicly-funded:**

Pharmacists or pharmacies may charge patients for the supply and administration of vaccinations which are not funded or reimbursed by the Ministry.

Any charges for vaccinations should be in accordance with the guidance provided by PAS.

The following are some common examples which pharmacists may encounter when administering vaccinations:

1. FLUVIRAL® (as the vaccine available to pharmacies under the Drug Plan IIP in 2015-2016):
  - a) Pharmacists must not charge the patient any fees for supplying or administering these vaccines when provided under the Drug Plan IIP. Pharmacies may collect the administration fee from the Ministry of Health for administering these vaccines under this Program.
  - b) It may be possible for pharmacies to acquire private stock of Drug Plan IIP vaccine products for administration during and beyond the flu season. This vaccination would not be provided under the Drug Plan IIP, so the pharmacist or pharmacy may charge the patient for the supply and administration of the vaccine. The pharmacist must advise the patient that the patient will not be reimbursed by the Ministry should they choose to pay for the vaccination under these circumstances. The pharmacy will not be paid an administration fee by the Ministry. Care must be taken to be satisfied that these vaccines, or any other influenza vaccine for that matter, are appropriately indicated given

the time of year and the patient properly informed accordingly. Members are encouraged to check with their RHA public health services/programs.

2. PNEUMOVAX® 23 (as a vaccine that is sometimes publicly funded when patients meet certain eligibility criteria):
  - a) As stated earlier herein, where a patient meets the eligibility criteria to obtain a vaccination paid for by the Ministry, the pharmacist must advise the patient of their eligibility for publicly funded vaccine. The pharmacist must advise the patient that the vaccination can be received free of charge from public health in a Regional Health Authority (RHA). The pharmacist must also advise the patient of the charges for the supply and administration of the vaccination, and that the patient will not be reimbursed by the Ministry for such charges. Pharmacies will not receive an administration fee from the Ministry for administering the vaccination.
  - b) If the patient does not meet the criteria to obtain this vaccination free of charge, the pharmacist or pharmacy may charge the patient for the vaccination. Pharmacies will not receive an administration fee from the Ministry for administering the vaccination.

Table 1 (page 5) provides further details on commonly encountered vaccines in community pharmacy practice along with their public funding status.

## Reporting

It is important for pharmacists to be able to report vaccines administered in order to keep the patient's immunization record in Panorama up to date. The Saskatchewan Immunization Manual (SIM) Chapter 4 states in part:

*"1.2.....All regional/jurisdictional health authorities in Saskatchewan document infant, childhood, adolescent, and adult immunization in SIMS...."*

### *2.2 Agency-Held Immunization records*

*1. All immunization providers or their respective agencies must maintain permanent immunization records (paper or electronic) for all clients.....*

*2. All immunization services must be immediately and accurately documented....."*

As specified in the bylaw record keeping requirements, the pharmacist must document the vaccination. We are working with Ministry and public health officials to develop protocols, tools and other resources to meet patient immunization record reporting requirements in Panorama. Until then and except for influenza vaccinations, we advise pharmacists to retain such records in a readily retrievable format to be used when we provide further direction on these reporting protocols.

When prescribed, provision of the vaccine must also be transmitted to PIP as this represents a supply of a drug that the law requires be transmitted to this database. PIP is not intended to be a substitute for a patient's immunization record.

## **B. DRUGS OTHER THAN VACCINES**

Upon Advanced Method Certification, pharmacists may administer drugs other than vaccines as patient needs determine and according to the drug's official product monograph. The pharmacist may charge the patient for the supply and administration, and may not collect an administration fee from the Ministry of Health.

As above, any charges for administering such drugs should be in accordance with the guidance provided by PAS. Also, when prescribed, provision of the drug must also be transmitted to PIP as this represents a supply of a drug that the law requires be transmitted to this database

This document is not intended to be an exhaustive review of all requirements of applicable legislation, the Pharmacy Proprietor Agreement, the SIM or of all situations pharmacists may encounter. Members with further questions are encouraged to contact the Saskatchewan College of Pharmacy Professionals at 306-584-2292.

**Table 1**  
**Commonly Encountered Vaccines in a Community Pharmacy and Current Saskatchewan Public Funding Status\***

Disease Coverage	Vaccine	Abbreviation	Publically Funded*	Drug Schedule <sup>1</sup>
Cholera, E. coli	Dukoral (oral)	Chol-Ecol-O	No	II
Hepatitis A	Avaxim	HA	Sometimes*	I
	Avaxim-Pediatric		Sometimes*	I
	Havrix		Sometimes*	I
	Havrix Jr		Sometimes*	I
	Vaqta		Sometimes*	I
Hepatitis B	Engerix-B	HB	Sometimes*	I
	Recombivax HB		Sometimes*	I
Hepatitis A & B	Twinrix	HAHB	Sometimes*	I
	Twinrix Jr		Sometimes*	I
Herpes Zoster	Zostavax II	Zos	No	I
Human Papillomavirus	Cervarix	HPV-2	No	II
	Gardasil	HPV-4	Sometimes*	II
	Gardasil 9	HPV-9	No	II
Pneumococcal Disease	Pneumovax 23 Polysaccharide 23-valent	Pneu-P-23	Sometimes*	II
	Prevnar 13 Pneumococcal Conjugate 13-valent	Pneu-C-13	Sometimes*	II
	Synflorix Pneumococcal Conjugate 10-valent	Pneu-C-10	No	II
Typhoid	Typhim Vi	Typh-I	No	I
Typhoid	Vivotif (oral)	Typh-O	No	I

\*Refer to the SIM, Chapter 10, for public funding eligibility criteria  
<http://www.ehealthsask.ca/services/manuals/Documents/sim-chapter10.pdf>. Accessed January 24, 2016.

<sup>1</sup>Refer to the NAPRA National Drug Schedule <http://napra.ca/pages/Schedules/Search.aspx>. Accessed January 24, 2016. Then refer to the SPCP Drug Schedule I for any variances at <http://scp.in1touch.org/uploaded/web/Bylaws-Admin-Sched-I-II-Current.pdf>.

This chart is not meant to be exhaustive. For more information refer to the SIM at <http://www.ehealthsask.ca/services/manuals/Pages/SIM.aspx>.

Questions?  
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