



Guidelines for Pharmacists and Pharmacy Technicians: Accessing Patient-Specific Information from the Medication Profile View (MPV) Available Under the Pharmaceutical Information Program (PIP)

In this document, unless the context indicates otherwise, “member(s)” includes licensed pharmacist(s) and pharmacy technician(s).

1. Definitions

Please see the Glossary of Terms attached as Schedule “A” for the definition of some of the terms used in these guidelines.

2. Accountability

eHealth Saskatchewan is the trustee for the PIP database. Personal health information accessed through the PIP is being shared on a trustee to trustee basis under HIPA. The pharmacy proprietor becomes the trustee for all PIP data accessed by the pharmacy. The pharmacy proprietor is responsible for ensuring that all pharmacists, pharmacy technicians or other persons with access to patient and PIP data within the pharmacy comply with these Guidelines.

3. Purpose

The primary purpose for accessing and using PIP data is to support or provide a health service to the patient to whom the personal health information relates.

Authorized secondary purposes include using and disclosing the PIP data are outlined in the SCPP document “Guidelines for Use and Disclosure of Personal Health Information for Secondary Purposes.”

Care must be taken to ensure only a minimal amount of information is used or disclosed. De-identified information should be used or disclosed if possible. The member must notify the patient in writing if they have relied on emergency circumstance to disclose information.

Reasonable grounds means the member has knowledge of reasonable facts. It does not include a mere suspicion or conclusion based on racial or socio-economic profiling.

4. Patient Control

A member will support and assist patients in using the masking functionality included within PIP. This will include:

- a) providing the patient with a PIP privacy brochure on request and pointing out to the patient the telephone number to call to request a form that allows the patient to implement the masking;

- b) explaining to the patient how masking works.

Members will respect the masking where implemented by the patient. Members may only access a masked drug profile in the following circumstances:

- a) Express consent of the patient has been obtained;
- b) In emergency circumstances where the member believes on reasonable grounds that the use or disclosure will avoid or minimize a danger to the health or safety of any person; or,
- c) A prescription being filled is on the list of dangerous drugs (refer to Appendix A of the corresponding policy statement).

Any requests by a patient to mask or unmask their information will be referred to the PIP Privacy Service.

5. Patient Communication

The member will ensure that PIP Privacy Brochures are readily available to their patients and provide a PIP Privacy Brochure to a patient on request.

The member will also reasonably respond to any direct questions from a patient regarding PIP and will attend PIP training sessions so that they can answer such questions. The member will not be required to answer in depth privacy questions but the member should be able to provide a reasonable overview of PIP. Any detailed questions should be referred to the pharmacy's privacy officer or PIP privacy service.

6. Limiting Use and Disclosure

The member will only use and disclose the PIP data on a need to know basis for the primary purpose of providing health services to the subject individual or for an authorized secondary purpose. The PIP data shall not be accessed, used or disclosed by a member for personal interest, gossip or financial gain.

Access within the pharmacy to the PIP will be limited to authorized users who have been appropriately registered and authorized with the PIP Administration Office.

Saskatchewan Health or eHealth Saskatchewan technical support will be allowed access to the PIP within the pharmacy. Such access should only be allowed after the pharmacy proprietor or pharmacy manager or their designate have taken reasonable steps to confirm the identity of the of the technical support person.

7. Safeguards

The pharmacy manager and the pharmacy proprietor must:

- a) implement the security standards outlined in the PIP Security Standards prior to connecting to the PIP;
- b) implement any changes to the PIP Security Standards when advised to do so by the

PIP Administration Office;

- c) ensure all staff and third parties who will access the PIP data have signed a confidentiality undertaking in the form called “Sample Employee Privacy Pledge and Confidentiality Pledge” attached to the guidelines entitled “Preparing Your Community Pharmacy for HIPA and PIPEDA”; and
- d) ensure reasonable security and confidentiality policies, procedures and practices are in place in compliance with applicable law.

8. Access by Patients

The member will allow their patients to have access to their medication profile except where access to such information may be denied in accordance with applicable law. In other words, the patients will have the same rights of access to their drug profile as they would have access to their other personal health information in the custody and control of the pharmacy. Members will provide a printed or electronic copy of the drug profile to the patient on request.

9. Amendment

Any requests for amendment to a patient’s drug profile will be documented by the member and forwarded to the PIP privacy service for processing. If applicable, the member will also provide their comment as to whether the amendment should be made or not made and any other relevant background information.

10. Complaints

Any complaints relating to a member’s access or use of the PIP Data will be dealt with in the same manner as any other patient complaint. If the complaint relates to how the PIP deals with processes or stores the information (rather than a practitioner’s use or disclosure of the information), the complaint should be referred to the PIP privacy service. Such a complaint should be referred as soon as possible so it can be addressed in an expeditious fashion.

Contact PIP Privacy Services

Toll Free: 1-800-667-1672
Regina: 306-787-8963

Questions?
info@saskpharm.ca

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**SCHEDULE “A”
GLOSSARY OF TERMS**

“Act”	means <i>The Pharmacy and Pharmacy Disciplines Act</i>
“Masking” and “Unmask”	means the functionality offered by PIP that allows a patient to globally mask and unmask the prescription drugs in their medication profile
“HIPA”	means the Health Information Protection Act (Saskatchewan)
“medication profile”	means the medication profile of the patient as stored in the PIP database
“personal health information”	means personal health information as defined in HIPA
“Pharmacist”	means a licensed pharmacist as defined in the Act
“Pharmacy Manager”	means a manager as defined in the Act
“Pharmacy Proprietor”	means a pharmacy proprietor as defined in the Act
“Pharmacy”	means a pharmacy as defined in the Act
“Pharmacy Technician”	means a licensed pharmacy technician as defined in the Act
“PIP Data”	means the medication profiles for all patients stored on PIP
“PIP Database”	means the database related to PIP which stores the PIP Data
“PIP Security Standards”	means the PIP Security Standards established from time to time and forwarded out to pharmacies by the trustee of the PIP Database
“trustee”	means a trustee as defined in HIPA