Drug Distribution by Prescription

A synopsis of federal and provincial acts and regulations governing the distribution of drugs in Saskatchewan. Reasonable steps must be taken to ensure that the prescription is legal, that the practitioner’s prescribing privileges are recognized in Saskatchewan, and that the right patient is receiving the medication (see Patient Identification Verification). However, the acts, regulations, and bylaws should always be consulted when applying the laws (also see Resources below). *Health Canada’s Section 56 Exemption is in effect until September 30, 2026 unless otherwise communicated by Health Canada. Exemptions are noted in red below. Detailed information can be found in SCPP’s Section 56 Exemption Communication and Practice Changes for Community Pharmacy.

**Definitions:**
- **Controlled Substance:** A substance listed in Schedules I – V to the Controlled Drugs and Substances Act (CDSA) and Narcotic Control Regulations (NCR).
- **Practitioner:** A person who is registered and entitled under the laws of a province to practise in the profession of medicine, dentistry, veterinary medicine, nurse practitioner, podiatrist and midwife. (See federal CDSA and SK The Drug Schedule Regulations).

Note: Regulators may place prescribing restrictions relating to PRP or other medications on their practitioners. For example, see CPSS’s Physicians with Prescribing Restrictions.

### CLASS & DEFINITION

<table>
<thead>
<tr>
<th>NARCOTICS*</th>
<th>EXAMPLES</th>
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<tbody>
<tr>
<td>Narcotics:</td>
<td>• buprenorphine (Suboxone)</td>
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<td>• codeine (Codeine Contin, Tylenol #4)</td>
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<td>• fentanyl</td>
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<td>• dextropropoxyphene (Lumodil)</td>
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<td>• hydroxyzine (Dilaudid, Hydroxyzine Contin)</td>
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<td>• hydrocodeine</td>
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<td>• methadone</td>
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<td>• morphpine (MS Contin, Statex, Kadian)</td>
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<tr>
<td>• naltrexone</td>
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<td>• oxycodone (Oxynax)</td>
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<td>• tramadol</td>
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</tbody>
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### FEDERAL

**PRESCRIPTION REQUIREMENTS**

<table>
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<tr>
<th>Narcotics:</th>
<th>Written prescription signed and dated by a practitioner.</th>
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The pharmacist must verify the signature of the practitioner if it is not known to them. *Section 56 Exemption (see SCPP Communication in effect until 2026): Verbal prescriptions are permitted for all controlled substances.

### REFILLS AND TRANSFERS

- **Refills:** Not permitted.
- **Transfers:** Not permitted.

### RECORDS

- **Purchase Records:** 
  - From a licensed dealer or emergency sale from another pharmacist must include: 
    - Name and quantity of the drug; 
    - Date received; 
    - Name and address of the person from whom the drug was received; 
  - Purchase records must be maintained in a book, register or other record maintained for such purposes.

- **Dispensing/Sale Records:** 
  - Include: 
    - Name or initials of the pharmacist; 
    - Name, initials, and address of the practitioner; 
    - Date and Rx/Tx number in a special prescription file. 

- **Printed Prescriptions:** 
  - Include: 
    - Practitioner’s name and address; 
    - Patient’s address; 
    - Patient’s date of birth; 
    - Number assigned to the prescription.

- **Verbal prescription:** 
  - Include: 
    - Directions for use.

### PRESCRIPTION REVIEW PROGRAM / SCP REQUIREMENTS

**Prescription Review Program (See TP):** Written prescriptions are preferred.

Verbal prescriptions for controlled substances to a pharmacist are permitted as a last resort if permitted by Health Canada. Rationales must be documented. (See section 18.1 CPSS Bylaws & PRP Joint Statement.)

Controlled substances may only be transferred once within Canada. (See Joint Statement in effect until September 30, 2026 or unless as otherwise communicated.)

- **Prescriptions for monitored drugs must include:** 
  - Patient’s date of birth; 
  - Patient’s address; 
  - Patient’s health services number; 
  - Practitioner’s name and address; 
  - Total quantity of drug prescribed, both numerically and in written form (both forms not required if Rx is by electronic transmission).

No refills permitted. A smaller portion of a total quantity may be dispensed at specified intervals.

**SCPP Requirements:**

- **Low-dose Codeine Preparations (Schedule II):** 
  - Pharmacists must complete low-dose codeine products training to sell without a prescription.
  - Non-prescription sales of low-dose codeine products cannot exceed 50 solid dosage units or 100 mL of liquid preparations.

Pharmacists are not permitted to purchase, store or resell products, only the consumer may purchase. Multiple sales are not permitted. All sales must be documented in the pharmacy’s patient profile and PIP.

- **See Low-Dose Codeine Products Conditions of Sale**
### CONTROLLED DRUGS

"Controlled drugs" are the controlled substances listed in the Schedule to Part G of the Food and Drug Regulations. See CDSA, and Part G of the Food and Drug Regulations (FDR).

Note: Only those controlled substances listed in Part G of the FDR are referred to as controlled drugs in the federal legislation.

#### Examples

- Written prescription and verbal prescription are permitted.
- See Narcotics section above for written and verbal prescription requirements.

#### Labelling Requirements:

- Name and address of pharmacy;
- Dispense date and prescription number;
- Patient’s name;
- Practitioner’s name;
- Directions for use;
- Any other information that the prescription requires be shown on the label.

#### Refills and Transfers

- Permitted for written prescriptions of controlled drugs listed in Part I.
- For all controlled drugs must include:
  - Number of times that it may be refilled.
  - The dates for refills, or the intervals between refills.

- Transfers:
  - Not permitted.

- "See Narcotics section above for Section 56 Exemptions."

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### BENZODIAZEPINES & OTHER TARGETED SUBSTANCES

“Targeted substances” (including benzodiazepines) are the controlled substances listed in Schedule II to the Benzodiazepines and Other Targeted Substances Regulations. See CDSA, and Benzodiazepines and Other Targeted Substances Regulations (BOTSIR).

Note: Only those controlled substances listed in the BOTSIR are referred to as targeted substances in the federal legislation.

#### Benzodiazepines

- Written prescription signed and dated, or verbal prescription from practitioner.
- The pharmacist must ensure the identity of the practitioner is verified.
- The signature on the prescription is unknown to the pharmacist, or
- The practitioner placing a verbal prescription is not known to the pharmacist.

#### Verbal Prescription Requirements:

- Pharmacist must create a written record of the verbal prescription showing:
  - Patient’s name and address;
  - Date;
  - Name of the drug;
  - Quantity and strength per unit of the drug;
  - Pharmacist’s name;
  - Practitioner’s name;
  - Directions for use;
  - Number of refills and interval if specified.

#### Labelling Requirements:

- Name and address of pharmacy;
- Dispense date and prescription number;
- Patient’s name;
- Practitioner’s name;
- Name of drug;
- Quantity and strength per unit of the drug;
- Directions for use.

- "See Narcotics section above for Section 56 Exemptions."

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### FEDERAL PRESCRIPTION REQUIREMENTS

#### Controlled Substances

- Written prescription and verbal prescription are permitted.
- See Narcotics section above for written and verbal prescription requirements.

#### Labeling Requirements:

- Name and address of pharmacy;
- Dispense date and prescription number;
- Patient’s name;
- Practitioner’s name;
- Name of drug;
- Quantity and strength per unit of the drug;
- Directions for use.

#### Refills and Transfers

- Permitted for written prescriptions of controlled drugs listed in Part I.
- For all controlled drugs must include:
  - Number of times that it may be refilled.
  - The dates for refills, or the intervals between refills.

#### Transfers:

- Not permitted.

- "See Narcotics section above for Section 56 Exemptions."

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### PROVINCIAL PRESCRIPTION REVIEW PROGRAM / SCPP REQUIREMENTS

- Purchase Records (from a licensed dealer or emergency sale from another pharmacist):
  - See Narcotics section above.
- Purchase records for controlled drugs listed in Part I must be maintained in a book, register or other record exclusively for controlled drugs. Purchase records for Part II and III may be maintained in a different manner. (See Health Canada references in Resources section below.)

#### Dispensing/Sale Records:

- Written prescriptions for controlled drugs listed in Part I:
  - See Narcotics section above.
- Verbal prescriptions for all controlled drugs:
  - See Narcotics section above.
- Dispensing records must be filed in order of date and Rx/Tx number in a special prescription file.

- "See Narcotics section above."
**FEDERAL**

**PRESCRIPTION RECORD REQUIREMENTS**

- Written or verbal prescription from practitioner.

**Refills:**
- Permitted for written and verbal prescriptions.
- Specific number of refills must be specified ("PRN" is not valid for refills).

**Transfers:**
- Written or verbally, between pharmacists or pharmacy technicians.
- Written transfers - must obtain a copy of the written prescription or written record of a verbal prescription.
- Verbal transfers - must record same information as required for Verbal Prescriptions.
- Receiving pharmacist / pharmacy technician must record:
  - Name and address of transferring pharmacist / pharmacy technician;
  - Date of last refill;
  - Transferring pharmacist / pharmacy technician must record:
    - Date of transfer.

**REPORTS:**

- Dispensing/Sale Records must include:
  - Date the drug was dispensed;
  - Quantity of drug dispensed;
  - Name of the pharmacist.

**RESOURCES:**

- Saskatchewan College of Podiatrists (SCOP)
- Saskatchewan College of Midwives (SCM)
- College of Registered Nurses of Saskatchewan (CRNS)
- Saskatchewan College of Physicians and Surgeons of Saskatchewan (SCPP)
- Saskatchewan Association of Optometrists (SAO)
- Saskatchewan Veterinary Medical Association (SVMA)
- Saskatchewan College of Physicians (SCS)
- Saskatchewan College of Dental Surgeons (SCDS)
- Saskatchewan College of Physiotherapists (SCPT)
- Saskatchewan College of Pharmacists (SCP)
- Saskatchewan College of Optometrists (SCO)
- Saskatchewan College of Psychologists (SCP)

**OTHER SASKATCHEWAN REQUIREMENTS (APPLY TO ALL DRUGS):**

- Retention period: Federal laws require that all records (prescription, transfer, purchase and dispensing/sale records) must be retained for 2 years from the date the record is made. Records must be retrievable in a timely manner in order to permit an efficient audit to be made. Also see SCPP’s Summary of Record Keeping Requirements and Record Keeping Requirements for ODA Drugs.

- **Prescription validity:** Prescriptions in Saskatchewan are valid for one year from its written date. Also see SCPP’s Prescription Validity, and Prescribing Privileges for Optometrists, Midwives, Medical Interns and Residents as recognized in The Drug Schedule Regulations. Also see *Dispensing Prescriptions issued by Out-of-Provincial Pharmacists* in Prescriptive Authority for Pharmacists – Frequently Asked Question.

- **Prescription Review Program / SCPP Requirements:** See Prescription Review Program: For PDL drugs monitored by the PRP (e.g., gabapentin, zopiclone): See Narcotics section above.

- **Web Signature** (CPSS Regulatory Bylaws s.17.1(d)): All prescriptions that are given directly to the patient whether handwritten or electronically generated must be counter-signed with a "wet" signature. See CPSS’s Electronic Transmission and Storage of Prescriptions for further details on different methods of transmitting a prescription.

- **SCPP Requirements:**
  - Prescription also include drugs listed in Schedule I of the SCPP Administrative Bylaws to The Pharmacy and Pharmaceutical Affairs Act, 1997.

**Resources:**

- Health Canada – Federal Regulatory Record Keeping Requirements
- Health Canada – Controlled Substances Guidance for Community Pharmacists: Security, Inventory Reconciliation and Record-Keeping
- College of Physicians and Surgeons of Saskatchewan (CPSS)
- College of Dental Surgeons of Saskatchewan (CDSS)
- Saskatchewan Association of Optometrists (SAO)
- Saskatchewan Veterinary Medical Association (SVMA)
- College of Registered Nurses of Saskatchewan (CRNS)
- Saskatchewan College of Midwives (SCM)
- Saskatchewan College of Physicians (SCS)
- Saskatchewan College of Podiatrists (SCOP)

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