



Emergency Exemptions for Prescribing Authority

1. Purpose:

The laws in Saskatchewan allow pharmacists to prescribe drugs under certain circumstances, where they are trained to do so. These circumstances and the associated restrictions and conditions are outlined in the [Saskatchewan College of Pharmacy Professionals \(SCPP\) Regulatory Bylaws](#) (Part K – Prescribing of Drugs).

In August 2019, these bylaws were changed to allow the Registrar to waive some of the restrictions and conditions in extraordinary circumstances, when it is in the public interest to do so. The new bylaws expand the prescriptive authority for pharmacists, in extraordinary circumstances. These bylaws do not limit or reduce a pharmacist's current prescribing authority. The extraordinary circumstances to which the new bylaws apply may affect a large patient population or a smaller sized patient population. Under these extraordinary circumstances, the Registrar may authorize pharmacists to prescribe:

- Quantities that exceed the limits in the bylaws;
- When the most previous prescription was issued by a pharmacist; or,
- When an active patient-practitioner (e.g., Physician, Registered Nurse - Nurse Practitioner) relationship no longer exists.

This policy outlines the criteria and circumstances that the Registrar will use in this decision.

2. Policy:

These bylaw amendments provide the College with greater flexibility to address extraordinary circumstances that temporarily impede the continuity of care for patients in Saskatchewan. They also promote interdisciplinary collaboration, by enabling the College to respond when concerns are raised by other health care providers.

2.1. **Extraordinary Circumstances:** For the purposes of clause 10(5) of the new bylaws, “extraordinary circumstances” include, but are not limited to:

- 2.1.1. When the patient is unable to obtain a new prescription from an authorized practitioner before running out of medication, due to extenuating circumstances in which the original prescriber is not available and has not made coverage arrangements to maintain patient care;

2.1.2. Subject to consultation with affected regulatory bodies, to continue a patient who is stable on a Schedule I drug at the same dose and duration, when their physician is not available to provide care for an undetermined period and has not made coverage arrangements to maintain patient care

2.1.2.1. These bylaws may be applied to Prescription Review Program medications as per terms and conditions set by the federal and provincial ministries of health and other stakeholders, as applicable, before enactment by the Registrar.

2.2. **Criteria that will Guide Exemptions:** For the purposes of clause 10(6) of the new bylaws, the following criteria will guide exemptions authorized by the Registrar:

2.2.1. That which is in the best interests of the public;

2.2.2. The urgency of the situation and the need for a timely decision;

2.2.3. Precedents that may apply;

2.2.4. The exemption is compatible with one or more of Council's values for the SCPP;

2.2.5. Promotes interdisciplinary collaboration;

2.2.6. Other alternatives have been examined and none of which are feasible; and

2.2.7. The Ministry of Health and other interested parties have been consulted and there is a preponderance of support in the public interest.

3. Procedure:

3.1 Requests for prescribing exemptions may come to the SCPP Registrar from:

3.1.1 Any other regulatory body with justification supporting the request. In this circumstance, the SCPP Registrar will collaborate with the Registrar of the regulatory body of the authorized practitioner to whom the extenuating circumstances apply; or

3.1.2 Pharmacists expressing reasonable grounds to believe an exemption would apply.

3.2 In accordance with clause 10(6) of the bylaws the Registrar will:

3.2.1 Document situations in which these prescribing exemptions were granted, the rationale used to support these decisions, and any other amendments that may be required to administer the bylaws as intended;

3.2.2 Communicate the exemptions to affected stakeholders including any limitations or restrictions; and

3.2.3 Report these exemptions to Council for monitoring.

4. Related Resources:

See [Prescriptive Authority – Pharmacists](#)

See [Emergency Preparedness Resource Kit for Pharmacists and Pharmacy Technicians](#)

5. Authority:

[Saskatchewan College of Pharmacy Professionals Regulatory Bylaws](#)