



RNAO

Registered Nurses' Association of Ontario
L'Association des infirmières et infirmiers
autorisés de l'Ontario

Ms. Anne Coghlan
Executive Director and CEO
College of Nurses of Ontario (CNO)
101 Davenport Road
Toronto, ON M5R 3P1

April 16, 2014

RE: "Purpose" requirement in orders to dispense medication

Dear Anne,

The Registered Nurses' of Ontario (RNAO) welcomes legislative and regulatory amendments which now provide registered nurses (RNs) and registered practical nurses (RPNs) with access to the controlled act of dispensing. However, we have received concern from our membership regarding the revised *Medication Practice Standard*. Specifically, our concern relates to the requirement that RNs and RPNs:

[accept] an order to dispense that is complete and includes the order date, client name, medication name, dose in units, route, frequency, **purpose**, quantity to dispense, and prescriber's name, signature and designation.

Requiring prescribers to include the **purpose** of the medication in the order to dispense is creating unintended barriers to accessing care. For example, vulnerable clients seeking low or no-cost hormonal contraception from Ontario's Public Health Units are now experiencing delays in accessing their medication. Clients are arriving at Public Health Units with a completed prescription, however, the purpose is not included. As a result, public health nurses are left scrambling trying to contact the prescriber for follow-up so their clients can gain access to their medication. This barrier conflicts with the Ministry of Health and Long-Term Care's requirement for 'Right Care, Right Time and Right Place' specified in the Minister's *Action Plan for Health Care*.

RNAO believes that the source of this barrier to care originates from conflicting regulatory requirements. For example, the College of Physicians and Surgeons of Ontario requires the following to be included on a prescription (per the *Prescribing Drugs*; Policy 8-12):

Physicians must include the following information on a prescription:

- Name of patient;
- Name of the drug, drug strength and quantity or duration of therapy;
- Full instructions for use of the drug;
- Full date (day, month and year);
- Refill instructions, if any;
- Printed name and signature of prescriber (if outside of an institution, include address and telephone number of location where medical records are kept);
- CPSO registration number; and
- Any additional information required by law.



RNAO

Registered Nurses' Association of Ontario
L'Association des infirmières et infirmiers
autorisés de l'Ontario

The purpose of the medication is not required by the College of Physicians and Surgeons to be included on a prescription.

Furthermore, the CNO requires that Nurse Practitioners include the following on a prescription (per the *Nurse Practitioner Practice Standard*):

NPs include the following information on a prescription

- prescription:
- the client's name and address
- the date
- the name and if applicable, the strength of the medication
- the dose, route of administration, frequency and if applicable, the duration of therapy
- the quantity of medication to be dispensed
- any special instructions
- the number of refills, if applicable, and
- the NP's name, business address, telephone number, protected title, registration number and signature.

The purpose of the medication is not required by the CNO to be included on a prescription.

Therefore, RNAO urges CNO to resolve this barrier to care by either:

a) Revising the *Medication Practice Standard* to remove the requirement to include the **purpose** of a medication in an order to dispense; or

b) Working with the College of Physicians and Surgeons to harmonize practice standards to ensure that prescribers are required to include the purpose of the medication in their prescriptions.

If you have any questions about RNAO's concern, please contact my office. Otherwise, we look forward to a prompt resolution to this barrier to care.

Warm regards,

Doris Grinspun, RN, MSN, PhD, LLD(hon), O.ONT.
Chief Executive Officer
Registered Nurses' Association of Ontario

cc. Hon. Deb Matthews, Minister of Health and Long-Term Care
Debra Bournes, Provincial Chief Nursing Officer, Nursing Policy and Innovation Branch,
MOHLTC