Practice Direction
Refill History Recording System

1.0 Scope and Objective:

1.1 Expected Outcome

This document is a practice direction by Council concerning implementation of concept of prescription refill recording systems through the authority of The Pharmaceutical Regulations to The Pharmaceutical Act and The Pharmaceutical Act. These systems may be used for all prescriptions, including targeted substances and other benzodiazepines, but not narcotic or controlled medication.

1.2 Document Jurisdiction (Area of Practice)

Standard of Practice 12 of the Regulations to The Pharmaceutical Act of Manitoba states that a member and an owner must create, maintain and retain records as required under the Act and regulations and in a form and manner that allows them to be accessed as promptly as needed.

1.3 Regulatory Authority Reference

Sections 56(1) and 56(2) of the Regulation to the Act allows Council to create this practice direction.

2.0 Practice Direction

2.1 Community Practice

2.1.1 A New Prescription With Refills Indicated:

2.1.1.1 Once a new prescription has been presented at a pharmacy for filling, the prescription information is then entered into a computer system that will maintain a readily accessible patient profile. At the time of entry of the prescription, the number of refills authorized by the prescriber is entered as well. If the refill authorization is indicated as a passage of time (e.g. refill for one year), that must be reflected by the information indicated in the computer and not simply indicated as being refillable a number of times (that would presumably be equivalent to that passage of time).
2.1.1.2 Refills authorized for targeted substances (benzodiazepines) are only valid for one year from the date of the original prescription and it would be desirable that the computer system must support this restriction.

2.1.2 A New Prescription With No Refills Indicated:

2.1.2.1 The new prescription is entered into the computer system that maintains a readily accessible patient profile and if there are no refills authorized, the prescription cannot be refilled. Should the patient return to the pharmacy, request a refill of that particular prescription and the prescriber is subsequently contacted and authorizes a "refill", a new prescription number and a new hard copy prescription must be generated and placed on the prescription file.

2.1.2.1.1 A “Continued Care” prescription issued by a pharmacist is considered a new prescription, not a refill prescription; a new prescription record must be prepared, with the pharmacist as the prescriber.

2.1.3 Record of Refills Under Above Section 2.1.1:

2.1.3.1 The refill of a prescription described in section 2.1.1 and elaborated on in sections 2.1.4.2 and 2.1.4.3 can be done without referring back to the original hard copy prescription if the pharmacist refilling the prescription is certain the information contained in the computer system is a true representation of the information on the original hard copy prescription.

2.1.4 Recording the Refill Information - Documentation of the prescription refill can be done utilizing one of the following systems:

2.1.4.1 Original Prescription File - Documentation of the prescription refill can be done on the original hardcopy prescription and would include:

- 2.1.4.1.1 Date of dispensing;
- 2.1.4.1.2 Quantity dispensed;
- 2.1.4.1.3 Price charged (if different from previous dispensing);
- 2.1.4.1.4 Handwritten signature or initials of the pharmacist dispensing the prescription;
- 2.1.4.1.5 Manufacturer's product used.
2.1.4.2 Logbook Recording System – The computer system must maintain the refill history of the prescriptions and the following refill information must be recorded in a hardcopy log book:

2.1.4.2.1 date of dispensing;
2.1.4.2.2 prescription number;
2.1.4.2.3 quantity dispensed;
2.1.4.2.4 handwritten signature or initials of the pharmacist dispensing the prescription;
2.1.4.2.5 price charged.
2.1.4.2.6 The logbook utilized must comply with the following requirements:

2.1.4.2.6.1 neat and orderly;
2.1.4.2.6.2 refill information must be listed in column form;
2.1.4.2.6.3 refill information must be clearly separated by date;
2.1.4.2.6.4 pages are separated by month and by year;
2.1.4.2.6.5 must contain refill prescriptions and may contain first fill prescriptions, and noted as such;
2.1.4.2.6.6 must be retained for two years beyond last refill date.

2.1.4.3 Transaction Refill System - The computer must generate an original or electronic copy refill prescription displaying all the pertinent information of the original prescription in compliance with section 70(1) of the regulations to the Pharmaceutical Act and maintain the prescription number of the original prescription. The "new" refill prescription will have a unique transaction number assigned to the hard copy:

2.1.4.3.1 The refill prescription transaction hard copy must display the original or electronic signature or initials of the pharmacist dispensing the prescription;
2.1.4.3.2 The prescription file in the pharmacy would be filed chronologically by transaction numbers or chronologically by date. The files would contain all new (with original written prescription attached, when available) and refill
transaction hard copies, filed together or separately, in a readily retrievable manner.

2.1.5 Retention of Records - Under section 79(1) of the regulations to the Pharmaceutical Act, records may be recorded and retained in either an electronic or written form. If a record requires a signature or an initial then it must be an original or electronic signature or initial. Prescription records must be retained for a period of at least five years either electronically or in written form. A scanned original and stored electronic copy would comply with section 79(1) of the regulations to the Pharmaceutical Act.

2.2 Personal Care Home Practice:

2.2.1 Where medications are provided for residents of personal care homes and the renewal authorizations come from the Quarter Medication Review sheets (QMR), these QMRS must be filed in a readily retrievable manner for the period of time required by law.

2.2.2 Where medications are provided for residents of personal care homes utilizing a printed daily log file, which is signed by the dispensing pharmacist, the daily log file can display both new and refill information (i.e. section 2.1.4.2 of this document would not apply).

2.2.3 In addition to the above two points, Personal Care Home pharmacy practice must be compliant with Community Practice Points 2.1 through 2.1.5.

2.3 Hospital Practice:

2.3.1 Hospital outpatient prescription refill recording systems must comply with this document. In patient prescription refill systems must be consistent with the Policy and Procedures established by the institution.

3.0 Compliance Adjudication

3.1 All documentation must be readily accessible and open to regulatory review

4.0 Appendices

Not applicable

A College Practice Direction is a written statement made by Council for the purposes of giving direction to members and owners about the conduct of their practice or pharmacy operations. Compliance with practice directions is required under the Pharmaceutical Act.

College of Pharmacists of Manitoba Mission:
To protect the health and well being of the public by ensuring and promoting safe, patient-centred and progressive pharmacy practice.

Member of the National Association of Pharmacy Regulatory Authorities
The process for development, consultation, implementation, appeal and review has been published on the MPhA website.

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