



PFAC Policy: Drug Security and Continuity of Care during Unexpected Interruptions of Service¹

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Preamble

The College expects that only accredited practice facilities be in possession of controlled drugs and prescription products. Responsibility for ensuring the security of controlled drug inventory and preventing public access to the general pharmacy lies with the Designated Registrant.

However, there are circumstances where maintaining controlled drugs and prescription products at the officially accredited practice facility location is either not possible or not appropriate. Examples could include:

- During the relocation of a fixed practice facility or of the non-public office of a mobile practice facility, when the original location is no longer available, but the new location has not yet been inspected and approved, or when there is no longer any physical presence at the old location as all staff are now busy at the new location in preparation for the inspection.
- During temporary closures for facility renovations or restorations, when contractors are present in the facility, but there may not be a regular veterinarian or staff presence.
- During necessary but unplanned-for evacuations of a facility due to natural disaster, accidents trigger an emergency closure of the facility for a prolonged or unforeseen period of time.

The Practice Facility Accreditation Committee (PFAC) recognizes that in circumstances such as these, the best interest of the public may in fact be better served by an appropriately orchestrated (and CVBC-approved) temporary relocation of these items away from the accredited practice facility pending resolution of the situation.

Additionally, in the circumstances listed above, the ability of a registrant to provide continuity of care is also interrupted. Ensuring timely client access to medical records must always be a priority when a practice facility closes, or services are temporarily interrupted. However, there are some instances where it may be reasonable for the veterinary practice to be able to provide telemedicine services for existing clients, including making recommendations for management of chronic conditions, and prescribing & dispensing medications.

This policy is intended to establish expectations and requirements for safe transport and temporary storage of controlled drug and prescription product inventory, away from a practice facility's CVBC-accredited location, pending resolution of the circumstances that prompted the drug relocation. The

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intended outcome of this process will be a short-term provisional approval of the drug storage location (irrespective of the actual address of the existing accredited practice facility). Continuity of care expectations, such as medical record availability, and limitations to the ability of a registrant to provide ongoing care to existing clients using the CVBC Telemedicine policy, when the physical facility is not available are also outlined.

Policy

The need to temporarily close a facility because of planned renovations or facility relocations should be anticipated in advance and PFAC expects that approval will be sought and received before the relocation occurs. Designated Registrants should be prepared for unexpected delays in completion of work or city inspections, as well as the necessary timeline for a Panel decision following a CVBC inspection and should therefore be prepared to implement plans to address continuity of care.

In circumstances where the need to relocate could not reasonably be foreseen, the Designated Registrant must notify the office as soon as possible after the relocation to request retroactive approval.

A. Relocation of Controlled and Prescription Products

The Practice Facility Accreditation Committee's Sub-Panel will consider requests for short-term provisional approval of a site away from the accredited practice facility location for controlled drug and prescription product storage. The following information and supporting items must be provided by the Designated Registrant for the Panel to review:

1. Explanation of the circumstances prompting the need for approval for relocation of the drugs
2. Description of how the drugs will be safely transported to the new location (if the practice facility does not include mobile accreditation)
3. Description of the physical measures in place at the temporary storage location to ensure security. These must include:
 - a. The name of the CVBC-registered veterinarian who will remain in control of the controlled and prescription products (ie. cannot be transferred into the possession of a non-veterinarian staff member)
 - b. A functioning, activated alarm system (photograph to support)
 - c. Secure drug storage as required by the CVBC's Accreditation Standards and *Professional Practice Standard: Controlled Drug Management & Disposal* (eg. secured safe, locked cupboard) (photographs to support)
 - d. No active construction or tradespeople having unsupervised access to the area where the drugs are stored

B. Continuity of Care during Temporary Interruptions of Services

Registrants must address the following accommodations and notify the College of what steps are being taken:

1. Registrants must ensure that clients and the public are appropriately notified of the temporary interruption of veterinary services and provide instructions for how to contact the practice to access medical records, and what to do if veterinary care is required (see CVBC Bylaws, s. 214-215). If the closure is anticipated (known relocation or renovations), efforts should be made in advance to ensure that clients can acquire sufficient refills of patient medications before the facility closure occurs.
2. Registrants must ensure that clients and other veterinarians are able to receive medical records in a timely manner. The Designated Registrant must explain to the CVBC plans for storage and timely access of medical records during the period when the fixed facility location is closed/inaccessible. If the facility will be closed for greater than a month, the CVBC will publish where the records are on its website.
3. Telemedicine – the CVBC’s Telemedicine guidelines require that telemedicine must be provided in association with an accredited practice facility. In instances of a short-term (less than 2 weeks) closure of the physical accredited facility location pending completion of a relocation into a new PFAC-approved location, renovations to the existing accredited location, or return to the accredited location following an emergency closure, the Practice Facility Accreditation Committee will accept that a veterinarian may consult with clients through telemedicine under the auspices of the practice accreditation, so long as clients are properly advised that in-person care is not an option presently and the veterinarian determines that the individual circumstances are appropriate for telemedicine care. Whenever possible, medications should be prescribed through a pharmacy. If the medication requires dispensing from a veterinary facility, arrangements should be made to securely deliver the medication to the client without them attending on-site at an unaccredited/temporarily closed location.