



## Alert Issuance Policy and Guideline

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# NOVA SCOTIA PRESCRIPTION MONITORING PROGRAM

## SECTION I

### ALERT ISSUANCE POLICY

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#### 1. Policy Objective

The purpose of this policy is to provide guidance to the Administrator to determine when it's appropriate to issue an alert on an individual or group and what processes should be involved to ensure the action is in accordance with the Prescription Monitoring Act, which requires the Program to:

- (a) Protect the privacy of any individual to whom the information may relate; and
- (b) Release information as is reasonable to achieve the objects of the Program.

#### 2. Policy Statement

As a function of its work, the Nova Scotia Prescription Monitoring Program has the responsibility to provide a process by which prescribers and pharmacists can be quickly notified in the event of efforts by an individual or group to gain access to monitored drugs for the purposes of misuse or abuse. This policy provides direction to the Administrator to:

- (a) Establish a transparent process through which communication with prescribers and pharmacists will promote a timely response to such activity;
- (b) Promote safety and decreased risk or drug diversion for misuse or abuse purposes.

#### 3. Responsibilities

The Board is responsible to monitor the effectiveness of the processes put in place by the Administrator to issue alerts.

The Administrator is responsible for implementing the guidelines included in this policy and for reporting to the Board at least annually on compliance with the policy.

#### 4. Legislative Framework

The Nova Scotia Prescription Monitoring Program is bound by the Prescription Monitoring Act (Act) and its regulations and the Freedom of Information and Protection of Privacy Act (FOIPOP Act) and its regulations. Specific sections of the Act applicable to the alert issuance process are cited here:

The Act states that the Administrator is responsible to:

- 12(2)(e) *monitor the use of monitored drugs by residents and report inappropriate use to*  
*(i) an appropriate law enforcement authority pursuant to subsection 23(1),*  
*(ii) an appropriate licensing authority pursuant to subsection 23(2), or*  
*(iii) A pharmacist or prescriber,*  
*if the Administrator is satisfied that the release of such information furthers the objects of the Program;*

The Act further indicates:

- 20 *Notwithstanding the Freedom of Information and Protection of Privacy Act, the Administrator may release*  
*(a) information with respect to monitored drugs; and*  
*(b) personal information with respect to a resident who has a prescription for monitored drugs, to a prescriber, a pharmacist, a licensing authority or other body or person as is reasonable to achieve the objects of the Program. (2004, c. 32, s. 20)*

## 5. Principles

The following principles will guide the Board's oversight of this policy:

- (a) A process for issuing alerts is established by the Administrator to provide a systematic approach to addressing immediate issues of potential abuse/misuse of monitored drugs.
- (b) The Administrator reports on the effectiveness of the policy to the Board annually.

## 6. Definitions

In this policy:

- (a) "Administrator" means the agency or person designated by the Minister to administer the Program, and for the purposes of this policy includes the Manager appointed by the Administrator or any other person employed by the Administrator.
- (b) "Alert" means a notification to prescribers and/or pharmacists of efforts by an individual or group to gain access to monitored drugs for the purposes of misuse or abuse.
- (c) "Board" means the Nova Scotia Prescription Monitoring Board established by this Act.
- (d) "Personal information" is defined in the Program's Privacy Policy.
- (e) "Program" means the Prescription Monitoring Program established by the Board

## 7. Scope

This policy applies to

- a) The Administrator;
- b) The Board;

## **8. Accountability**

The Administrator has responsibility for the ongoing monitoring and enforcement of this policy. Annually, the Administrator provides the Board with a report of all alerts and their outcomes.

## **9. Challenging Compliance**

Any challenge to the Program's compliance with this policy shall be provided in writing to the Manager.

# NOVA SCOTIA PRESCRIPTION MONITORING PROGRAM

## SECTION II

### GUIDELINES

#### Operational Guideline for the Administrator

##### Alert Process

The Administrator will determine the requirement to issue an alert to pharmacists and prescribers. The factors considered in deciding to issue an alert include, but are not limited to, the following:

- (a) The Administrator has received information (from one or more key stakeholders) of current activity by an individual or group of individuals which may represent efforts to secure monitored drugs for the purposes of abuse or misuse.
- (b) Review of Program data is supportive of reported activity.
- (c) Review of the individual or group's profile and previous activity is consistent with expressed concerns.
- (d) The individual or group is currently known to the Program due to potentially inappropriate activity.
- (e) The Administrator has had previous contact with prescribers, pharmacists or law enforcement regarding the individual/group.
- (f) The activity is significant enough to warrant notification due to safety concerns and to meet the objectives of the program.

The Manager or designate must approve the issuance of an alert to prescribers and/or pharmacists. When approval is provided, the following process will be implemented:

- (a) The reasons for approval of the alert will be documented for future reference.
- (b) The applicable Alert Form will be completed (Appendix A or B).
- (c) The Manager or designate will determine who will be included in the alert.
- (d) The Alert will be issued to pharmacists and/or prescribers either by mass fax or through their licensing authority."
- (e) The alert will be scanned and attached to the **Notes** section within the PMP case management system of the individual(s) involved.

- (f) The outcome or response regarding the alert will be recorded for tracking and reporting purposes.
- (g) The Manager or designate will determine whether law enforcement officials will be contacted. This will be assessed on a case by case basis in relation to the observed activity and will be undertaken in accordance with the policy and guideline on working with law enforcement officials.

## Definitions

In this guideline:

- (a) "Administrator" means the agency or person designated by the Minister to administer the Program, and for the purposes of this policy includes the Manager appointed by the Administrator or any other person employed by the Administrator.
- (b) "Alert" means a notification to prescribers and/or pharmacists of efforts by an individual or group to gain access to monitored drugs for the purposes of misuse or abuse.
- (c) "Board" means the Nova Scotia Prescription Monitoring Board established by this Act.
- (d) "Law enforcement" is defined within the Prescription Monitoring Act to include the following:
  - *policing, including criminal-intelligence operations,*
  - *investigations that lead or could lead to a penalty or sanction being imposed, and*
  - *Proceedings that lead or could lead to a penalty or sanction being imposed.*
- (e) "Licensing authority" means the College of Physicians and Surgeons, the College of Pharmacists, the Provincial Dental Board or the College of Registered Nurses of Nova Scotia.
- (f) "Patient Profile" means the overall history of an individual's dispensed prescriptions for monitored drugs.
- (g) "Personal information" is defined in the Program's Privacy Policy.
- (h) "Program" means the Prescription Monitoring Program established by the Board.

**NOVA SCOTIA PRESCRIPTION MONITORING PROGRAM**

**SECTION III**

**Appendix A – Stolen Pad Alert Form**



# ALERT



## CONFIDENTIAL

To:	All Nova Scotia Pharmacies
Pages:	1

### Date

Please be advised that the Nova Scotia Prescription Monitoring Program has been informed that a Duplicate Prescription Pad belonging to (prescriber name) has been **STOLEN**. The duplicate prescription numbers are as follows:


These prescriptions have been inactivated in the Prescription Monitoring System.

If you are presented with one of the duplicate prescriptions, please forward a copy to the NSPMP via fax at 481-3157. As well, please contact (prescriber name) directly at 902-XXX-XXXX and your local area Law Enforcement.

If you have any questions, please contact the Nova Scotia Prescription Monitoring Program at 902-496-7123 or toll free 1-877-476-7767.

## **Appendix B – B&E\_Armed Robbery Alert Form**

# ALERT



## CONFIDENTIAL

To:	All Nova Scotia Pharmacies
From:	Nova Scotia Prescription Monitoring Program
Pages:	1

### Date

Please be advised that the Nova Scotia Prescription Monitoring Program received notification on MMM, DD, YYYY that a pharmacy in the \_\_\_\_\_ County area was the victim of an (insert crime i.e attempted break and enter/armed robbery) on MMM, DD, YYYY which occurred during business hours. The monitored drugs sought were (insert drug name(s)).

The safety of pharmacy employees is of utmost importance; therefore, no unnecessary risks should be taken by staff during the course of a robbery. For additional information please refer to the following link to access the Guidelines: *Prevention and Management of Pharmacy Robberies and Break-Ins in Nova Scotia*, provided by Nova Scotia law enforcement agencies

[http://www.nspharmacists.ca/resources/documents/RobberyBreakinPreventnGuidelineSept19\\_12.pdf](http://www.nspharmacists.ca/resources/documents/RobberyBreakinPreventnGuidelineSept19_12.pdf)

Should your pharmacy be the victim of a break and enter or armed robbery, please ensure that law enforcement is notified as soon as possible. As well, please inform the Nova Scotia College of Pharmacists (902)-422-8528, and the Nova Scotia Prescription Monitoring Program (902) 496-7123.