

Executive Officer Notice: Updated Documentation Sharing Requirements for MedsCheck

Effective May 26, 2025

The purpose of this Executive Officer (EO) Notice and Frequently Asked Questions (FAQs) document is to:

- Remove the mandatory requirement to share MedsCheck documentation with the patient's primary prescriber in some instances; and,
- Set out the terms and conditions under which prescriber notification is still required

Disclaimer: This EO Notice and the accompanying FAQs are intended to provide pharmacy operators with information about the requirements for the MedsCheck program. The EO Notice and the accompanying FAQs do not provide any opinion regarding symptom assessment, health counselling or medical opinion for patients and do not constitute medical advice or legal advice for pharmacy operators or pharmacists. Pharmacy operators and pharmacists are responsible for complying with any obligations they may have in connection with providing MedsChecks under applicable laws and policies, and any instructions or guidelines provided by the Ontario College of Pharmacists or the ministry.

Updated Pharmacy Documentation Requirements

Pharmacies and pharmacists shall keep records consistent with their obligations under applicable law, including the *Pharmacy Act, 1991* and the *Drug and Pharmacies Regulation Act*, and under any instructions or guidelines provided by the OCP or the ministry.

Effective May 26, 2025, if no follow-up issues for the prescriber have been identified, or notification is not necessary to support the patient's care, pharmacists are no longer required to send the MedsCheck Personal Medication Record or the standardized notification letter/fax template to the patient's primary prescriber.

Pharmacies must notify primary care providers of a MedsCheck only when the pharmacist's actions are clinically significant and/or the notification is necessary to support the patient's care. The decision of whether to send the documentation is based on the pharmacist's clinical judgment.

If the decision is made to share the documentation, pharmacists must share the MedsCheck Personal Medication Record with the patient's primary prescriber using a standardized notification letter/fax template as soon as possible. Pharmacists' professional notes may still also be shared with prescribers and patients, upon request.



Regardless of whether any MedsCheck documentation is sent to the primary prescriber, all other documentation requirements must still be followed, as detailed in existing <u>EO Notices</u> in place, the <u>Professional Pharmacy Services Guidebook 3.0</u> (the "Guidebook"), the <u>Ontario Drug Programs Reference Manual</u> (the "Manual"), and the <u>Professional Pharmacy Services</u> <u>Questions and Answers for Pharmacists</u> (the "Qs & As").

Documentation

If issues requiring prescriber follow-up are identified and/or the notification is necessary to support the patient's care, and the MedsCheck Personal Medication Record is sent to the prescriber, pharmacies must clearly maintain proof that the MedsCheck Record was shared with the primary prescriber.

Pharmacists are still required to use the fillable ministry forms and templates or an adapted version developed by their pharmacy software vendor that accommodates what the ministry requires, based on the template examples.

All required documentation forms and pharmacy records for the MedsCheck program remain subject to inspection and must be maintained in or readily available to the pharmacy. Billing a MedsCheck service without complete documentation or without patient consent or for purposes that are outside of the specified program criteria may be subject to recovery. MedsCheck documentation must be kept for the Retention Period, as defined in the Manual, and in accordance with O Reg 264/16 (under the *Drug and Pharmacies Regulation Act*).

Exclusions and Restrictions

This EO Notice only pertains to the notification requirement under the MedsCheck program to share the MedsCheck Personal Medication Record with the patient's primary prescriber.

Clarification

Until the next update to the Guidebook, or the Qs & As, if there is a conflict between this EO Notice and rules in the Guidebook, Manual, or the Qs & As with respect to the requirement to share the MedsCheck Personal Medication Record with prescribers and maintain documentation to demonstrate that the MedsCheck Personal Medication Record was shared with prescribers, this EO Notice prevails.



FAQs: Updated Documentation Sharing Requirements for MedsCheck

1. What is the purpose of notifying the primary care provider?

Notifying the primary care provider ensures continuity of care and allows the prescriber to be aware of any significant changes or issues identified when providing care to a patient. This helps in coordinating patient care and making informed decisions about treatment plans.

2. How are prescribers "notified" of a MedsCheck?

In the EO Notice – Updated Documentation Sharing Requirements for MedsCheck, prescriber notification of a MedsCheck refers to sharing the MedsCheck Personal Medication Record with the patient's primary prescriber using the standardized notification letter/fax template.

- **3. Under which circumstances is provider notification no longer required?** Provider notification is no longer required if:
 - No follow-up issues for the physician have been identified during the MedsCheck; or,
 - Notification is not necessary to support the patient's care.
- 4. Under which circumstances is prescriber notification still required under the MedsCheck program?

Provider notification is still required under the MedsCheck program when:

- The pharmacist's actions during the MedsCheck are clinically significant. For instance, if a clinically significant drug interaction is identified; or,
- Issues requiring prescriber follow-up have been identified during the MedsCheck; or,
- The notification is necessary to support the patient's care. For example, a patient having difficulties obtaining a medication, or medication nonadherence affecting patient status.
- 5. How should the pharmacist determine whether or not to notify the prescriber?

The pharmacist should use their clinical judgment to determine clinical significance, and whether notification is necessary. If the MedsCheck review identifies issues that require prescriber follow-up or if the pharmacist's actions are clinically significant, notification must be made. If no such issues are identified and/or notification is not necessary for patient care, the pharmacist may choose not to notify the prescriber.



6. Why is this change occurring?

This change is occurring to reduce administrative burden on pharmacists and primary care providers. By removing the mandatory requirement to notify the prescriber in certain instances, pharmacists can focus on clinically significant actions and ensure that notifications are made only when required to support patient care.

- **7.** How does this affect the notification requirements for other actions? This change only pertains to the MedsCheck program.
- 8. What documentation must be maintained, in situations where the prescriber is notified?

Please refer to the EO Notice – Updated Documentation Sharing Requirements for MedsCheck for details on the requirements for maintaining documentation.

Additional Information:

For pharmacy billing:

Please call ODB Pharmacy Health Desk at: 1-800-668-6641

For general and detailed information on MedsCheck, please refer to:

- Professional Pharmacy Services Guidebook 3.0
- Ontario Drug Programs Reference Manual
- Professional Pharmacy Services Questions and Answers for Pharmacists

For inquiries relating to MedsCheck:

Please email the ministry at: medscheck.moh@ontario.ca

For all other Health Care Providers and the Public:

Please call ServiceOntario, Infoline at 1-866-532-3161 TTY 1-800-387-5559. In Toronto, TTY 416-327-4282