New Brunswick College of Pharmacists
Ordre des pharmaciens du Nouveau-Brunswick

Frequently Asked Questions: Virtual Pharmacy Practice Policy

? Why is this policy necessary?
Virtual health and virtual care are an evolving area of practice in health care, including pharmacies. The Virtual Pharmacy Care Policy (the Policy) was developed to support pharmacy professionals and pharmacy managers who elect to engage in virtual practice.

? Does care provided via email or telephone constitute virtual care?
Virtual care is defined as "any care that is provided through a source of technology and not through an in-person clinical interaction". Care provided through videoconferencing, telephone or email would constitute virtual care. Any administrative or clerical technological interaction, like text message reminders, would not constitute virtual care.

? How does the Policy impact using FaceTime and Skype communication platforms to monitor patient response to drug therapy? What about text messages?
If pharmacy professionals are engaged in virtual pharmacy practice, they must ensure the communication platform being used possesses the necessary privacy safeguards. Pharmacy professionals are responsible for researching and using their judgement to determine if existing communication platforms provide sufficient security. If the virtual practice includes patient assessment or follow-up monitoring, the platform must permit gathering relevant patient data.

? How does the Policy impact care via the telephone?
Virtual care has been provided by pharmacists and pharmacy technicians traditionally using the telephone. However, the increased use of communication (voice and text) applications and web-enabled videoconferencing to provide patient care via a public domain create additional risks to patients. The Policy applies to the use of telephones in virtual care, however, some of the technological requirements may not be applicable to telephone given that it is considered secure.

? How does the Policy apply to providing general advice using social media?
Posting information on social media that could be considered as the practice of pharmacy is subject to the Policy. Pharmacy professionals should carefully consider whether social media is the best mode of communicating clinical advice to patients and must consider any potential risks and unintended consequences prior to providing advice via social media.

? Can a pharmacy professional provide virtual care remotely (i.e., away from the practice site)?
Pharmacy professionals can provide virtual care remotely if they fulfill the requirements included in the Policy. The next question relates to practicing pharmacy across jurisdictional borders.

? What if the pharmacy professional providing virtual care or the patient is not in New Brunswick?
The pharmacy professional must provide care that meets the requirements of the pharmacy regulatory authority or jurisdiction(s) in which they are licensed as well as within the jurisdiction where the patient resides.

? What needs to be done before a virtual care appointment?
Prior to a patient's appointment, pharmacy professionals should advise the patient to:
· be aware of the risks in using equipment which is not their personal computer or device (e.g., an employer's or third party's computer or device).
· establish and use a secure account to engage in the communication.
· use a secure internet connection
· select an environment where there is little to no opportunity for unintended audiences to overhear the interaction.
At the beginning of an appointment, pharmacy professionals must confirm the identity of the patient or their authorized representative.

Pharmacy professionals must ensure they are in an acoustically-private and appropriate environment to avoid inadvertently exposing patient information to others. Pharmacy professionals may want to consider having a headset or a speaker to ensure the patient is audible and their dialogue cannot be heard.

? Would a text message or WhatsApp message be considered secure?
Electronic communication systems are considered secure if the platform provides end-to-end encryption for the users. Depending on how a text message is sent and the settings of the sender and receiver, a text message may or may not be encrypted. At the time of writing, WhatsApp provides users with end-to-end encryption. Pharmacy professionals are responsible for ensuring the electronic communication systems used are secure.