POLICY CATEGORY:
POLICY NAME:
POLICY NUMBER:
AUTHORITY DERIVED FROM:
ORIGINAL APPROVAL DATE:
CATEST REVISION DATE:
LATEST MOTION NUMBER:

Practice Directive Temporary Pharmacy Closure GR-PD-TPC-01 Regulation 14.15 May 21, 2024 C-24-05-04

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

Policy: Temporary Pharmacy Closure

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INTRODUCTION

Temporary closures¹ of pharmacies can have severe consequences for patients who rely on vital medications and pharmacy services. While these closures may occur for various reasons, it is essential that patients have uninterrupted access to their medications and medical records. Well-defined guidance outlining the necessary steps that pharmacy managers, pharmacists, pharmacy technicians, and other personnel involved in the operation of a pharmacy must follow in the event of a temporary closure will decrease risk to patient's access to care.

Purpose

This Policy provides guidance for managing both anticipated and unanticipated temporary pharmacy closures. Temporary pharmacy closures are found in the Regulations under section 14.15. By complying with this Policy, pharmacy managers, pharmacists, pharmacy technicians, and other pharmacy staff can take all necessary actions to minimize the impact of such closures on patients.

Policy

General

- 1. A pharmacy may temporarily close without forfeiting its certificate of operation if requirements outlined in this policy are met for:
 - 1.1. Anticipated Closures: Up to 14 days during a calendar year
 - 1.2. Unanticipated Closure: Up to 90 consecutive days
- 2. A Temporary Pharmacy Closure Notification Form must be sent to the College for any temporary closure, specifically:
 - 2.1. at least 7 days in advance of an anticipated closure longer than one day, and
 - 2.2. as soon as reasonably possible for unanticipated closures.

Anticipated Pharmacy Closure (no more than 14 consecutive days):

The need for anticipated closures, while infrequent, are significant events that arise from predictable circumstances. Such closures are most commonly necessitated by staffing shortages due to vacations or parental leave, etc.

- 3. In such situations, the pharmacy manager is responsible for:
 - 3.1. Notifying the College and obtaining approval by submitting a Temporary Pharmacy Closure Form
 - 3.1.1. Anticipated Closure: Form must be submitted at least 7 days in advance (unless otherwise approved by the College).
 - 3.2. Notifying the public of the anticipated closure.

¹ <u>Temporary Closures:</u> A pharmacy will be closed and inaccessible to the public for more than one day and less than 90 days, with the expectation of reopening under the same certificate of operation.

- 3.2.1. Contact all patients for whom prescriptions have been prepared to advise of the closure and provide them with an opportunity to obtain their prepared prescriptions prior to the temporary closure start date.
- 3.2.2. Provide a recorded telephone message and post notices using in-store signage, road signs, websites, social media posts (and other media outlets) at least 7 days in advance of an anticipated closure.
- 3.2.3. Efforts are to be made to communicate the pharmacy's closure to local prescribers and pharmacies in vicinity to help ensure continuity of care.
- 3.3. Securing personal health information and planning for emergency access to patient records in accordance with New Brunswick's privacy legislation during the period of closure.
- 3.4. The security of all medications in the Controlled Drugs and Substances Act (CDSA), and Schedule I, II, and III medications, throughout the period of closure.

Unanticipated Pharmacy Closure

An unanticipated pharmacy closure may be required when unexpected events or emergencies, such as natural disasters, public health crises, utility failures, structural issues, or security incidents occur. The pharmacy may need to close temporarily, for a period of up to 90 days, for the safety of both patients and staff.

- 4. In such situations, the pharmacy manager is responsible for:
 - 4.1. Notifying the College by submitting a Temporary Pharmacy Closure Form as soon as possible.
 - 4.2. Notification is to include plans for maintaining premises security, accessing pharmacy records, and the anticipated reopening date.
 - 4.3.If staff safety will not be negatively impacted, the pharmacy is to be secured from unauthorized access to drugs and patient health information (PHI).
 - 4.4. If the premises are safe and accessible, a recorded telephone message and notices may be used to inform the public; these could include in-store signage, signs outside of the facility, websites, social media posts (and other media outlets).

Reopening after a Temporary Closure:

- 5. Preparing to re-open the pharmacy:
 - 5.1.In an event which included damage to the facilities, or loss of power, professional judgement is to be applied in assessing medications that may have been impacted or rendered nonuseable during the closure.
 - 5.2. Conduct narcotic counts and reconciliation soon after the pharmacy has reopened.
 - 5.3. After an unanticipated pharmacy closure:
 - 5.3.1. The pharmacy manager must advise the college of any renovations required after an event, and a pharmacy assessment may be required prior to reopening, in accordance with Regulation 14.7.

5.3.2.	If the physical facility is rendered un-useable, or if the pharmacy is not expected to reopen within 90 days, the pharmacy manager is to follow requirements in the Regulations for a permanent closure (Regulation 14.12 to 14.14).

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APPENDIX A

Temporary Pharmacy Closure Notification Form for use by Pharmacy Managers; submitted to the College.

This form is available at the New Brunswick College of Pharmacists' website.²

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² https://nbpharmacists.ca/a-operations/