

What Can Pharmacists Do Under the Controlled Drugs and Substances Act (CDSA) During the COVID-19 Pandemic?

In order to support the continuity of patient care during COVID-19, Health Canada made [several temporary exemptions to the CDSA](#) that allow pharmacists to extend/renew, transfer, delegate deliveries and accept verbal orders for prescriptions of opioids or other controlled substances.

Most jurisdictions have incorporated these activities into their pharmacists' scope of practice, and some have also now authorized the ability for pharmacists to adapt prescriptions for controlled substances (already permitted under the CDSA).



Extend/Renew Prescriptions



Adapt Prescriptions
(adjust dose, regimen or formulation; taper or stop)



Transfer Prescriptions



Direct Pharmacy Staff to Deliver Prescriptions



Accept Verbal Orders for Prescriptions

*Please refer to CPhA's latest [“COVID-19 and CDSA chart”](#) for an overview of authorized activities by jurisdiction.

EXAMPLE: Adapting a Prescription in Ontario

Sarah is a pharmacist in Ontario who practices in a community setting.

HU, one of Sarah's patients, is a 42-year old male on hydromorphone 12 mg PO q12h. He is currently experiencing drowsiness and decreased libido — adverse reactions indicating the hydromorphone dose may be too high.

HU's primary prescriber office is closed. How will HU get his medication dose adjusted if he can't see his prescriber?

Because of new regulation in Ontario arising from the CDSA exemptions Sarah can now adjust the hydromorphone dose. To adapt the prescription, Sarah:



- Ensures HU is under her professional care
- Identifies any potential drug related problems (i.e., appropriateness of dose)
- Attempts to contact the original prescriber

Outcome:

- Sarah adapts the prescription to a lower dose of hydromorphone 9 mg PO QAM and 12 mg PO QPM; Sarah ensures quantity dispensed does not exceed the original amount
- Sarah is unable to contact the original prescriber, but will follow up with the prescriber regarding adaptation of HU's medication
- Sarah will follow up with the patient in the next few days, monitoring HU's pain levels and possible withdrawal symptoms. Sarah will taper the dose as appropriate



HU has received continuity of care with the prescription adaption



Before the CDSA Exemptions:

- ☒ Pharmacists in Ontario were not permitted to adapt opioid agonist therapy
- ☒ Patients would need to visit their prescriber for a medical assessment and if appropriate, a new prescription



After the CDSA Exemptions:

- ☒ Pharmacists in Ontario are permitted to adapt opioid related prescriptions
- ☒ Patients can have their medication regimen modified by a pharmacist where they cannot otherwise see their prescriber



Please note: the CDSA exemptions are subject to provincial or territorial legislation.

For more information, please consult with your Provincial Regulatory Authority or local ministry of health and/or visit the [CPhA website](#) for resources.