

Risky Business: How the Ontario College of Pharmacists is identifying and responding to new and emerging risks

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Overview:

- 1. The context
- 2. Regulatory risk and the pharmacy practice risk framework
- 3. A case study



1. The context (briefly)



Health Regulation In Ontario



that regulate



over





Their duty is to protect the public, making sure healthcare professionals are providing care and services that are safe, ethical, and competent.

Acupuncturists Audiologists Chiropodists Chiropractors **Dental Hygienists Dental Technologists** Dentists Denturists Dietitians Homeopaths **Kinesiologists** Massage Therapists Medical Laboratory Technologists Medical Radiation Technologists Midwives Naturopaths Nurses **Occupational Therapists** Opticians Optometrists Pharmacists and Pharmacy Technicians Physicians and Surgeons Physiotherapists Psychologists and Psychological Associates Psychotherapists **Respiratory Therapists** Speech-Language Pathologists Traditional Chinese Medicine Practitioners

*Does not yet include Physician Assistants and Applied Behavioral Therapists pending regulation



THE TWO SIDES TO OUR ROLE

The People Regulated Pharmacy Professionals

The Place

Accredited Pharmacies

2. Regulatory risk and the pharmacy practice risk framework



When you think of right- touch regulation, using one word, tell us- what do you think of?





Practice-Based Risk

Creating the risk framework

Expert opinion (staff, Board, partners)

Literature (journals, websites, insurance reports)

OCP or other pharmacy regulatory data

Data from other regulators



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Framework (draft) Risk The



Assessing Risk





Data inventory to identify gaps/needs



3. A case study



Increasing concern over business practices





Summary

Focus on Practice-based risk, not internal corporate risk or process- based risk Use a systematic way of thinking about a practice risk model – combining expert opinion, public input, literature, data Complete a data inventory and assess against the dimensions of relevant risk; supplement as needed

Create corporate-wide approach to assessing data to identify hotspots and respond

Evaluate everything

Concurrently, focus on change management principles – internally and externally





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Supplementary slides if needed

Who We Regulate – "The People"





Where We Regulate – "The Place"



Ownership in 2022				
363 small chains	836 large chains	3,669 independently owned		
3 to 19 pharmacies owned by a single corporation)	(20+ pharmacies owned by a single corporation)	(1-2 pharmacies owned by a single corporation)		
70	9	1.783		
banner	banner	banner		
165	0	516		
franchise	franchise	franchise		

Place of Practice	Pharmacist	Pharmacy Technician			
Community pharmacy	12,219	1,933			
Hospital and other healthcare facilities	2,975	3,283			
No workplace recorded	1,592	286			
Association/academia/government	310	81			
Industry/other	656	96			
Pharmacy corporate office/ professional practice/clinic	109	9			
Data shown is from 2022					

Banner: Pharmacies that are affiliated with a central office where they use a recognized name and may participate in centralized buying, marketing, professional programs, etc. Franchise: Pharmacy is owned by franchisee who enters a business relationship with a company (franchisor) for the legal usage of the franchisor's name and products

DIMENSION	ADD	SOURCE
Changes to pharmacy practice (macro level)	Changes in scope to other professions (midwives, NP), not properly equipped – no EMR, clinical viewers	
Factors related to pharmacy professional (training, KES, Comms, demographics, mental/physical challenges, previous complaint)	Lack of KES on EDI/Queer/trans/indigenous health	
Factors related to drug being dispensed (controlled substances, high risk drugs, cancer)		
Factors related to patien t (frail, senior, pediatric, mental illness, addictions)	Lower SES (can't afford), language barrier	
Factors related to interaction w/patient (no proper assess, dispensing errors, adverse events, documentation, compounding)	Failed to ask about side effects	
Business practices (privacy breach, loss of \$ info, racism, lack of accommodation for disabilities, safety/robberies, approp equipment/staffing)	Lack of secure comms (texts), clinical viewers not being used	
System issues (transitions of care, access, systemic racism)	Hierarchy in healthcare, lack of trust by others	21

The Risk Matrix

Likelihood/ Impact	Negligible Impact (1)	Low impact (2)	Moderate Impact (3)	High Impact (4)	Catastrophic Impact (5)
Highly Unlikely (1)	Negligible Risk (1)				
Unlikely (2)		Low Risk (4)			
Possible (3)			Moderate Risk (9)		
Likely (4)				High Risk (16)	
Highly Likely (5)					Major Risk (25)





Significant discrepancies in performance



Percentage of pharmacies meeting Operational Standards (2017): Corporation "A" pharmacies versus all-other



Pharmacists

a patients first since 187

Pharmacies owned by large corporation "A"

All other community pharmacies



Data-driven culture

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Data Quality Stream	Data Analytics stream	Risk identification and priorities	KTE	Partnerships and Research	
IT system (CRM, Radar, Hedgehog, Pharmapod)	Regular review of data (important findings, trends)	Using our data: Regular monitoring and reporting of identified risks	Integrate implementation science lit into comms and other behavior-change initiatives	Inventory of existing collaborations. Analysis of fit Identification of OCP Role	
Data inventory	Support for analytics (statistical? Methods support)	Regular review of literature – at a minimum OCP lit/findings	Vetting initiatives to make sure they are measurable so we <i>can</i> do KTE piece	Prioritization framework	
Data governance	Building research questions	Leadership discussion and review			
Documentation and Coding	Building evaluation frameworks	Prioritization process and decision-making framework	Publications		
Data reconciliation (quality/accuracy review and cleaning)	Lit review support	PDSA cycle for implementing responses EVALUATION			
	Support for regular or one- time data queries	Partnerships: e.g., govt, schools, PEBC, NAPRA			
CAPACITY					
(staffing, corporate Board	25				

capacity in each team, dedicated time and focus)