

Role Clarification of Non-Regulated Pharmacy Employees



As the pharmacy practice environment continues to grow in complexity there remains a place for pharmacy assistants in our profession. In Alberta, **Pharmacy Employee** means an individual employed in a pharmacy who is not a regulated member of the Alberta College of Pharmacy and includes a volunteer who works in a pharmacy.ⁱ **Pharmacy Assistant** is the most commonly used title for non-regulated pharmacy employees.

Pharmacy assistants may complete certain pharmacy activities under the **direct** supervision of a pharmacy technician or pharmacist. This document outlines appropriate tasks for trained and supervised non-regulated pharmacy employees based on interpretation of the practice framework in an ideal practice setting that includes pharmacy technicians.



Patient Care

Activity	Pharmacy Technician	Non-Regulated Employee
Gather and document patient health information required to create a patient record (Std 2.1, 2.2, 18, 20.7, Appendix A)	Yes	Yes
Gather information for submission of an account to an insurance carrier (Std 20.7)	Yes	Yes
Assist the pharmacist in identifying the patient's health needs and expectations (Std 2.2, 20.7)	Yes	No
Gather information required to assess the appropriateness of drug therapy (Std. 2.2, 20.7)	Yes	No
Identify actual or potential drug therapy problems that require referral to a pharmacist (Std. 1.8, 5.2, 20.6, 20.7)	Yes	No
Conduct point of care tests (Std Laboratory and Point-of-Care-Testing)	Yes	No

Completion of most patient care activities requires professional judgement and for the pharmacy professional to enter into a relationship with the patient.

These tasks are more appropriately performed by pharmacy technicians and pharmacists

Receiving Orders, Transferring Care and Documentation

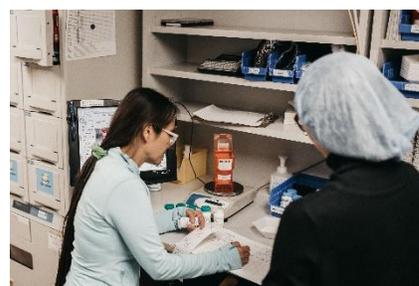
Pharmacy assistants are not authorized by legislation to complete certain activities that fall within the pharmacy technician's scope of practice.

Activity	Pharmacy Technician	Non-Regulated Employee	Activity	Pharmacy Technician	Non-Regulated Employee
Receive a verbal order from a prescriber for a schedule 1 drug, reduce to writing and sign or initial (Std. 6.8, 20.7)	Yes	No	Document the pharmacy technician's or pharmacist's activities in the patient care record or chart (Std. 18.2; 18.8; 18.9)	Yes	No
Document changes to prescriptions as a result of an authorization from the original prescriber (Std. 5.4, 20.6, 20.7)	Yes	No	Make corrections in patient care records when required (Std. 18.5, 20.6, 20.7)	Yes	No
Transfer and receive prescriptions that can legally be transferred to another pharmacy on behalf of a pharmacist (Std. 20.7, 20.9, 2.7, 2.8)	Yes	No	Act as a witness when a pharmacist destroys narcotic or controlled drugs (Narcotic Control Regulations)	Yes	No

Supervision

Activity	Pharmacy Technician	Non-Regulated Employee
Supervise a provisional pharmacy technician or a student pharmacy technician in the performance of restricted activities (Std. 20.4, 20.5)	Yes	No
Supervise an employee engaged in compounding or providing drugs for sale (Std. 20.6; 20.7; 20.8)	Yes	No

Pharmacy assistants must be directly supervised by a pharmacy professional



Dispensing, Compounding and Repackaging

Dispensing and compounding are restricted activities that are considered potentially harmful if performed by unqualified persons. ⁱⁱ Appropriately trained pharmacy assistants may help provide restricted activities under the direct supervision of a pharmacy technician or pharmacist.

Activity	Pharmacy Technician	Non-Regulated Employee
Accept a new or refill prescription from a patient (Std. 2, 20.6, 20.7)	Yes	Yes
Select, count and package a drug from stock (Std. 20.7)	Yes	Yes
Document activities completed in the dispensing process to create a clear audit trail (Std. 7.16, 7.17, 20.7)	Yes	Yes
Create a written transaction record for each drug dispensed (Std. 18.1, 20.7)	Yes	Yes
Determine that a new or refill prescription is current, authentic and complete (Std. 6, 20.6, 20.7)	Yes	No
Ensure appropriate dispensing procedures are used (Std. 7, 20.7)	Yes	No
Perform a final check of new or refill prescription to ensure that each step in the dispensing process has been completed properly (Std. 7.14)	Yes	No
Perform a final check of a prescription for a narcotic, controlled drug or targeted substance (Std. 7.14)	Yes	No



Non-regulated employees may measure ingredients and physically mix non-sterile compounds that do not require the specialized skills and training of a pharmacy technician or pharmacist



Activity	Pharmacy Technician	Non-Regulated Employee
Compound <u>non-sterile</u> drugs according to a written formula and preparation process (Std. 10.1, 10.2, 20.6, 20.8)	Yes	Yes
Repackage drugs following appropriate procedures (Std. 20.7, 21)	Yes	Yes
Assign a beyond use date based on reputable sources of information (Std. 10.9, 20.6, 20.8)	Yes	No
Perform <u>sterile</u> compounding in an environment and according to procedures that meet ACP requirements (Std. 10.12, 10.13, 20.6, 20.8)	Yes	No
Perform a final check to ensure that each step in the compounding process has been completed accurately and according to the written formula and process (Std. 10.14, 20.6, 20.7, 20.8)	Yes	No
Perform a final check of repackaged drugs (Std. 20.6, 20.7, 21)	Yes	No

Prescription Release and Patient Teaching

Pharmacists and pharmacy technicians must ensure that all procedures are met when supervising non-regulated pharmacy employees. A pharmacy assistant may not release a prescription to a patient in the absence of a pharmacy professional directly supervising the activities they are performing.

Like other patient care activities teaching requires the pharmacy professional to enter into a relationship with the patient. Instruction about health care products and devices requires the specialized knowledge and training of pharmacy professionals.

Activity	Pharmacy Technician	Non-Regulated Employee
Finalize the commercial aspects of the sale after a prescription or schedule 2 drug has been released to a patient (Std. 20.7)	Yes	Yes
Refer patient questions to a pharmacist or pharmacy technician as appropriate (Std. 1.8; 2.2; 5; 8.2(c); 9.3, 20.7)	Yes	Yes
Ensure a pharmacist has assessed the patient, evaluated the prescription or the sale and provided required information to a patient to release a prescription or schedule 2 drug (Std. 8.1, 8.2, 20.7)	Yes	No
Identify patients who require assistance from a pharmacist or may face a risk from the selection or use of a schedule 3 drug, health care product, aid or device (Std. 2, 9.3, 20.6, 20.7)	Yes	No
Answer questions from patients about schedule 3 drugs, health care products, aids or devices that do not require therapeutic knowledge, clinical analysis or assessment (Std. 1.8,2, 20.6, 20.7)	Yes	No
Enter into a dialogue and provide assistance to patients choosing health care products, aids or devices (Std. 2, 9.4, 20.6, 20.7)	Yes	No
Provide instruction to patients about how to operate or use health care products, aids or devices (Std. 2, 9.4,20.6, 20.7)	Yes	No



Inventory Management

Inventory management activities may be completed by non-regulated employees when the task does not require specialized pharmacy knowledge or judgement to be applied.

Activity	Pharmacy Technician	Non-Regulated Employee
Maintain inventory records for the purpose of ensuring adequate stock is ordered and available (Std. 20.7)	Yes	Yes
Receive medication orders and place into stock (Std. 20.7)	Yes	Yes
Enter information into the information management system about the sale of a drug (Std. 20.7)	Yes	Yes
Enter information about the sale of a drug into the patient record (Std. 20.7)	Yes	Yes
Ensure physical stock levels correspond with stock levels recorded into the information management system	Yes	Yes
Document stock movement	Yes	Yes
Maintain inventory records for the purpose of ensuring adequate stock is ordered and available (Std. 20.7)	Yes	Yes
Receive medication orders and place into stock (Std. 20.7)	Yes	Yes
Enter information into the information management system about the sale of a drug (Std. 20.7)	Yes	Yes
Reconcile inventory record discrepancies independently	Yes	No



Questions about the pharmacy technician's scope of practice or role of non-regulated pharmacy employees may be directed to info@ptsa.ca

ⁱ *Standards of Practice for Pharmacists and Pharmacy Technicians*. Alberta College of Pharmacy. July 2011.

ⁱⁱ *Government Organization Act, RSA 2000, c G-10*. Current to 2019-12-05 according to the [Alberta Queen's printer](#)