

COLLEGE OF CHIROPODISTS OF ONTARIO

BRIEFING DOCUMENT FOR AMENDMENTS TO THE COLLEGE'S EXISTING DRUG REGULATION (BEING PART I, SECTIONS 1, 2, 3 AND 4 AND SCHEDULES 1, 2, 3, AND 4 OF REGULATION 203/94) RELATED TO THE INJECTING OF DRUGS INTO THE FOOT AND THE PRESCRIBING OF DRUGS FOR PATIENTS

The Minister of Health has indicated to certain Regulated Health Professions, including this College, that it was prepared to make amendments to existing drug regulations to allow members to choose from categories (instead of lists) of drugs in order for members to be able to prescribe the most appropriate drug for a patient without the need to send the patient back to the family physician for that prescription. This change has been sought by this College and others for some years and will assist in improving the care which our members can provide to their patients. In addition, the Ministry of Health is supportive of expanding the narcotic and anxiolytic drugs that appropriately trained members can prescribe. However, for those drugs there will continue to be limitations of which drugs (via a list) can be prescribed, maximum daily dosages and maximum durations. There will also be a new Schedule of drugs (Enhanced Drugs) consisting of antifungals for oral use and antihistamines for oral use which appropriately trained members will be entitled to prescribe.

In addition, the College is proposing to expand the list of drugs that may be injected into a patient's foot by all members. These changes are reflected in Schedule 1 of the proposed amendments to the existing Regulation and are self-explanatory.

The intent of the draft Regulation amendments, which are shown via a redlined copy comparing the current Regulation with the proposed Regulation (Appendix A), is to achieve the following:

1. To the extent supported by the Ministry, to replace the existing drug specific lists (existing Schedules 2 and 3) with categories. We have been directed by the Ministry to use the American Hospital Formulary Service (AHFS) categories and have done so. Categories were not supported by the Ministry for narcotics and anxiolytics and therefore they are still listed as individual drugs and still subject to maximum daily dosage and maximum durations.

2. To add a new Schedule to permit members who have met the standard of practice set out in the Regulation (i.e. who have appropriate training) to prescribe additional drugs namely, antifungals for oral use and antihistamines for oral use.

3. To expand the list of narcotics and anxiolytics which members who meet the standard of practice/have appropriate training can prescribe. But as indicated above, the choice of drugs will continue to be limited to a list of certain drugs and be subject to maximum daily dosage and maximum durations. These limitations are ones which the Ministry has directed.

4. To specify which members will be entitled to prescribe drugs and which drugs (Schedule of Drugs) they will be able to prescribe. The amendments are not intending to remove a member's current entitlement to prescribe a drug under the existing Regulation. The amendments are intending to recognize that certain members who have the appropriate training will be able to prescribe all of the drugs referred to in the proposed Regulation, and others will be required to meet a specified standard of practice requiring proof of appropriate education/training before being allowed to do so.

In addition, and importantly, the Regulation amendments contemplate that the College will approve or arrange education course(s) for:

i. members who do not currently have the authority or education to prescribe any drugs but who wish to do so;

ii. members who have limited authority to prescribe certain drugs, (i.e. those drugs listed in the Schedules to the current/existing Regulation) and who wish to obtain additional education to be able to prescribe all of the drugs permitted to be prescribed by members as set out in the proposed Regulation, including narcotics, anxiolytics, oral antifungals and oral antihistamines.