CDSS PRESCRIBING, ADMINISTERING, AND DISPENSING OF DRUGS STANDARD

The College of Dental Surgeons of Saskatchewan

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INTRODUCTION

The College of Dental Surgeons of Saskatchewan is committed to the safe and effective use of prescription drugs. Dentists may need to administer drugs to provide treatment to a patient, or a written prescription may be indicated afterwards. Therefore, it is essential that dental professionals know the requirements for prescribing, dispensing, and administering drugs.

The purpose of this Standard is to assist registrants regarding prescribing, dispensing, and administering drugs.

LEGISLATION

1. The federal and provincial laws and regulations governing the distribution of drugs by prescription in Saskatchewan are as follows:
    - The Dental Disciplines Act (Saskatchewan) 1997
    - Food and Drugs Act (Canada) 1985
    - Food and Drugs Regulations (Canada)
    - Controlled Drugs and Substances Act (Canada) 1996
    - Narcotic Control Regulations (Canada)
    - Benzodiazepines and Other Targeted Substances Regulations (Canada)
    - The Prescription Drugs Act (Saskatchewan) 1978
    - The Prescription Drugs Regulations (Saskatchewan) 1993
    - The Pharmacy Act (Saskatchewan) 1996
    - The Drug Schedules Regulations (Saskatchewan) 1997

2. Pursuant to the Dental Disciplines Act, Authorized Practices 23(1)(f), A dentist is authorized, subject to the terms, conditions and limitations of that person's licence: to prescribe or dispense drugs in the provision of dental treatment.

3. Dentists who can prescribe, dispense, or administer drugs according to the Dental Disciplines Act and subject to the terms, conditions, and limitations of their licence include: general dentist registrants, specialist registrants, and locum registrants. Academic registrants, student registrants, temporary registrants,

nonpracticing registrants, and suspended registrants cannot prescribe, dispense, or administer drugs.

4. Pursuant to The Drug Schedule Regulations (1997) Prescription privileges - dentist 7:

   (1) A dentist registered and licensed pursuant to The Dental Profession Act, 1978 may, subject to the terms, conditions and restrictions of a licence issued pursuant to The Dental Disciplines Act, prescribe any drug listed in Schedule I, II or III that is intended for the purpose of providing dental treatment to humans.

   (2) A dentist who possesses qualifications similar to those of a dentist mentioned in subsection (1) and who is licensed pursuant to a law of another jurisdiction in Canada providing for the granting of licences to dentists to practise their profession may, subject to the terms, conditions and restrictions of that licence, prescribe any drug listed in Schedule I, II or III that is intended for the purpose of providing dental treatment to humans.

5. Pursuant to The Drug Schedule Regulations (1997) Drug schedules 2:

   (1) Three drug schedules are established as set forth in this section.

   (2) Schedule I, entitled “Prescription Drugs”, consists of the following:
      (a) the drugs listed in the schedules to the Narcotic Control Regulations (Canada) other than a drug mentioned in section 36 of those regulations;
      (b) the drugs listed in Schedule F of the Food and Drug Regulations (Canada) other than a drug listed in Part II of that Schedule:
         (i) that is not in a form suitable for use by a human; or
         (ii) for which the main product panel of both the inner label and the outer label clearly indicates that the drug is for veterinary use only;
      (c) the drugs listed in the schedule to Part G of the Food and Drug Regulations (Canada);
      (d) those drugs determined by the council pursuant to section 3.

   (3) Schedule II, entitled “Non-Prescription Restricted Access Drugs”, consists of the following:
      a) pseudoephedrine, pseudoephedrine hydrochloride or pseudoephedrine sulphate, but only with respect to products in which pseudoephedrine, pseudoephedrine hydrochloride or pseudoephedrine sulphate is the single active ingredient;
      b) those drugs determined by the council pursuant to section 3.

   (4) Schedule III, entitled “Pharmacy Only Non-Prescription Drugs”, consists of those drugs determined by the council pursuant to section 3.

6. Pursuant to the Controlled Drugs and Substances Act definitions: a *practitioner* means a person who is registered and entitled under the laws of a province to practise in that province the profession of medicine, dentistry or veterinary medicine, and includes any other person or class of persons prescribed as a practitioner.

7. Dentists must be knowledgeable about indications, contraindications, properties, maximum dosing, interactions, and adverse effects of the drugs being prescribed, dispensed, or administered.

8. Dentists must only prescribe or dispense drugs: for patients of record; if the drug is required in the provision of dental treatment for the patient; and within the dentist’s scope of practice and training.

9. Pursuant to the College of Dental Surgeons of Saskatchewan (CDSS) Code of Ethics Article A14: Prescribing Medications for Self and Family - A dentist must not prescribe medications for themselves. Dentists may prescribe medications for family members only when indicated specifically for oral health treatment. “Family” is defined as a dentist's parents, sisters, brothers, wife or husband, and children.

10. Dentists must not prescribe or dispense or administer any drugs for family unless they are patients of record in the provision of dental treatment within the dentist's scope of practice and training.
11. Dentists must not dispense any of the Panel of Monitored Drugs (PMD) of the Prescription Review Program (PRP).
12. Dentists must not prescribe or administer any of the Panel of Monitored Drugs (PMD) of the Prescription Review Program (PRP) for family, unless they are patients of record in the provision of dental treatment within the dentist's scope of practice and training, and only in an emergent or necessary circumstance.
13. Pursuant to the Narcotic Control Regulations section 56, if a dentist alleges or, in any prosecution for an offense under the laws or regulations, pleads that their possession of a monitored drug was for use in their practice or that they prescribed or administered a monitored drug to any person as a patient under their professional treatment and that such monitored drug was required for the condition for which the patient received treatment, the burden of proof thereof shall be on such dentist. The evidence needed to support this would be detailed records.
14. Pursuant to the College of Dental Surgeons of Saskatchewan (CDSS) Regulatory Bylaws 4(3)b: A registrant shall not, nor permit a professional corporation in which the registrant is a director to:
    (xxiii) sell or supply a drug or medical product of biological preparation by a registrant to a patient at a profit;
    (xxiv) improperly use the authority to prescribe, sell or dispense a drug, or falsify a record in respect of a prescription or the sale of a drug.

15. MINIMUM STANDARDS FOR WRITTEN AND VERBAL PRESCRIPTIONS OF DRUGS ISSUED BY DENTISTS

(a) Safe patient care requires clear written or verbal communication between dentists and licensed pharmacy professionals (pharmacists or pharmacy technicians), in accordance with policies established by the Saskatchewan College of Pharmacy Professionals, to minimize the risk of drug dispensing errors. To that end, the following defines minimum standards for written and verbal prescriptions issued by dentists.

(b) For the purpose of this guideline, "written prescription" includes an electronic prescription that meets the requirements for electronic prescribing under the Pharmaceutical Information Program.

(c) For the purpose of this standard, "signature" includes a method of dentist identification that meets the requirements for electronic prescribing under the Pharmaceutical Information Program.

(d) Handwritten prescriptions given directly to the patient must be signed manually. Electronically generated prescriptions that are printed and given directly to the patient must be counter-signed with a "wet" signature.

(e) A dentist who issues a written prescription must include all of the following information on the prescription in a manner that is fully legible:
    (i) the date of the prescription;
    (ii) the dentist's name, College licence number, and signature;
    (iii) the patient's name;
    (iv) the full name of the drug;
    (v) the concentration of the drug where appropriate;
    (vi) the strength of the drug where appropriate;
    (vii) the dosage of the drug;
    (viii) the quantity of the drug prescribed or the duration of treatment;

(ix) the form of the drug;
(x) the administration route of the drug if other than oral;
(xi) explicit instructions for patient usage of the drug;
(xii) the number of refills where refills are authorized.

(f) All of this information shall be contained on one side of the prescription form.

(g) Notations such as “use as directed” or similar remarks do not meet the requirements of e(xi) except where usage instructions are uniformly included on the manufacturer’s drug packaging label.

(h) A dentist who issues a prescription which prohibits drug substitution by the licensed pharmacy professional must hand write those instructions or initial any pre-printed instructions to that effect.

(i) A dentist who issues a prescription for the purpose of obtaining drugs from a licensed pharmacy professional for professional office use must explicitly make a notation on the prescription that the drugs in question are for professional office use.

(j) Dentists may transmit written prescriptions to licensed pharmacy professionals by fax, or other electronic means, in accordance with policies that may be adopted by the Saskatchewan College of Pharmacy Professionals from time to time. All of the provisions of paragraphs (b) through (g) above apply to a prescription transmitted by fax.

(k) Other than prescriptions transmitted in accordance with the policies and protocols of the Pharmaceutical Information Program, a dentist shall only transmit written prescriptions to licensed pharmacy professionals by fax or other electronic means based upon patient instructions to transmit the prescription to a specific pharmacy.

(l) A dentist who issues a verbal prescription to a licensed pharmacy professional must provide to the licensed pharmacy professional all of the information described in paragraphs (e)(i) through (e)(xii).

(m) All verbal prescriptions must be communicated directly between a dentist and a licensed pharmacy professional, as permitted by the Saskatchewan College of Pharmacy Professionals, as opposed to agents for either licensed professional.

(n) A dentist shall record on the patient’s chart the following information:
(i) Date of prescription and method (written or verbal);
(ii) Name, strength, quantity, and form of drug;
(iii) Instructions for use of drug if copy of written prescription is not kept in the chart.

16. MINIMUM STANDARDS FOR DISPENSING DRUGS BY DENTISTS

(a) A dentist who dispenses a drug must comply with all the federal and provincial laws relating to the storage, handling, distribution, labeling, packaging and recording of information.

(b) A dentist must dispense a prescription in a “child-resistant” package.

(c) A dentist must dispense a prescription with a label containing the following information:
(i) date of dispensing;
(ii) name, address and telephone number of dispensing practitioner (and institution where applicable);
(iii) name of patient;

(iv) instructions for use of drug;
(v) identification of contents:
(A) the full name of the drug;
(B) the concentration of the drug where appropriate;
(C) the strength of the drug where appropriate;
(D) the dosage of the drug;
(E) the quantity of the drug prescribed or the duration of treatment;
(F) the form of the drug;
(G) the name of manufacturer or DIN # (unless brand name is used).

(d) A dentist shall record on the patient's chart the following information:
(i) date of dispensing;
(ii) name, strength, quantity, and form of drug;
(iii) instructions for use of drug.

(e) Dentists must not dispense any of the Panel of Monitored Drugs (PMD) of the Prescription Review Program (PRP).

17. MINIMUM STANDARDS FOR THE ADMINISTRATION OF DRUGS BY DENTISTS

(a) Dentists must only administer drugs immediately preceding or during treatment: for patients of record; if the drug is required in the provision of dental treatment for the patient; within the dentist's scope of practice and training; and within compliance of the standards, permits, and authorizations of the College.

(b) Examples of administration of drugs by dentists includes, but is not limited to: antibiotic prophylaxis, local anesthetics, analgesics, sedation, neuromodulators, and emergency.

(c) A dentist shall record on the patient's chart the following information:
(i) date of administration;
(ii) name, quantity, strength, and form of drug;
(iii) patient response to the drug.

18. MINIMUM STANDARDS FOR WRITTEN AND VERBAL PRESCRIPTIONS OF THE PANEL OF MONITORED DRUGS (PMD) OF THE PRESCRIPTION REVIEW PROGRAM (PRP) ISSUED BY DENTISTS

(a) Prescriptions for drugs monitored by the Prescription Review Program shall be issued by dentists according to the policies and procedures agreed to and amended from time to time by the College of Dental Surgeons of Saskatchewan, the College of Physicians and Surgeons of Saskatchewan, the College of Registered Nurses of Saskatchewan, and the Saskatchewan College of Pharmacy Professionals.

(b) The office of the Registrar may gather and analyze information pertaining to the prescribing of drugs to which the Prescription Review Program applies in Saskatchewan for the purpose of limiting the inappropriate prescribing and inappropriate use of such drugs.

(c) The Prescription Review Program Panel of Monitored Drugs (APPENDIX A) shall apply to all dosage forms of the following drugs, their salts and/or enantiomers, in all dosage forms, as a single active ingredient or as a combination product, except where indicated otherwise.

(d) **Prior to prescribing a monitored drug to which the Prescription Review Program applies, dentists shall review the patient's medical profile and prescription history within the Pharmaceutical Information Program (PIP).**

(e) In order to prescribe a drug to which the Prescription Review Program applies, dentists shall complete a

written prescription which meets federal and provincial legal requirements and includes the following:

(i) the date of the prescription;
(ii) the dentist's name, College licence number, **address**, and signature;
(iii) the patient's name;
(iv) the patient's **date of birth**;
(v) the patient's **health services number;**
(vi) the patient's **address**;
(vii) the full name of the drug;
(viii) the concentration of the drug where appropriate;
(ix) the strength of the drug where appropriate;
(x) the dosage of the drug;
(xi) the quantity of the drug prescribed **(numerical and written form)** or the duration of treatment;
(xii) the form of the drug;
(xiii) the administration route of the drug if other than oral;
(xiv) explicit instructions for patient usage of the drug;
(xv) the number of refills where refills are authorized.

(f) A "written prescription" includes an electronic prescription that meets the requirements for electronic prescribing under the Pharmaceutical Information Program.

(g) A dentist who prescribes a monitored drug to which the Prescription Review Program applies, and who provides the prescription directly to a pharmacy by electronic prescribing, by email or by FAX, or who transmits a prescription in accordance with the policies and protocols of the Pharmaceutical Information Program, need not include both the quantity numerically and in written form.

(h) A dentist who prescribes a monitored drug to which the Prescription Review Program applies must also satisfy the requirements of 15(a) to 15(n).

(i) A dentist should consider providing monitored drug prescriptions directly to a pharmacy by electronic prescribing via the Pharmaceutical Information Program (PIP), by email, or by FAX.

(j) Pursuant to the Narcotic Control Regulations section 57, the Minister shall provide in writing any factual information about a practitioner that has been obtained to the licensing authority responsible for the registration or authorization of the person to practice their profession.

19. MINIMUM STANDARDS FOR THE ADMINISTRATION OF THE PANEL OF MONITORED DRUGS (PMD) OF THE PRESCRIPTION REVIEW PROGRAM (PRP) BY DENTISTS

(a) Dentists must only administer monitored drugs immediately preceding or during treatment: for patients of record; if the drug is required in the provision of dental treatment for the patient; within the dentist's scope of practice and training; and within compliance of the standards, permits, and authorizations of the College.

(b) Examples of administration of monitored drugs by dentists includes but is not limited to: analgesic and sedation.

(c) A dentist shall record on the patient's chart the following information:

(i) date of administration;
(ii) name, quantity, strength, and form of drug;
(iii) patient response to the drug.

(d) Dentists must keep a separate register for: each monitored drug to which the Prescription Review Program applies, that are purchased or obtained for the dentist's practice, and a record of all such drugs administered to a patient in the dentist's office, including:

(i) prescription date;
(ii) prescription identification number;
(iii) prescribing dentist name;
(iv) name, strength, form, and quantity of monitored drug;
(v) date the drug is administered;
(vi) name of patient to whom drug is administered;
(vii) name of dentist that administered the drug;
(viii) dental condition being treated;
(ix) dental treatment;
(x) quantity of drug administered;
(xi) quantity of drug remaining.

(e) The College has developed a "Register for In-Office Use of Monitored Drugs of the Prescription Review Program" form (Appendix B) which can be used to collect the required information.

(f) The register referred to in paragraph (d) must be kept separate from the patient's dental record and must be provided to the College upon request.

(g) Pursuant to the Narcotic Control Regulations section 55, a dentist must provide access to records to authorized inspectors and must:
(i) permit an inspector to make copies of such records;
(ii) permit an inspector to check all stocks of monitored drugs on the dentist's premises;
(iii) report to the Registrar any loss or theft of a monitored drug within ten days of the dentist's discovery of the loss or theft.

(h) Pursuant to the Narcotic Control Regulations section 55, dentists must take adequate steps to protect monitored drugs in their possession.

(i) Dentists must keep monitored drugs in a locked storage cupboard.

(j) Dentists must institute an inventory of all monitored drugs and substances.

(k) Dentists must keep careful control of blank prescription pads and never pre-sign prescription sheets.

(l) Dentists must arrange staff training sessions and meetings to discuss the dangers of drug and substance abuse to remind staff of the safeguards and protocols in the office to prevent misuse of supplies.

20. COUNCIL DECISIONS WITH RESPECT TO PRESCRIBING, DISPENSING, OR ADMINISTERING OF DRUGS

(a) Chloral hydrate is not permitted for prescribing, dispensing, or administering by dentists.

ACKNOWLEDGEMENTS

The College acknowledges that this standard has been adapted, in many parts with no changes, from the respective statements of British Columbia College of Oral Health Professionals and the College of Physicians and Surgeons of Saskatchewan.

The College recognizes, with thanks, the contributions of these organizations to the development of this standard.

APPENDIX A

THE PRESCRIPTION REVIEW PROGRAM (a) Panel of Monitored Drugs – The Prescription Review Program shall apply to all dosage forms of anabolic steroids, barbiturates, benzodiazepines, opioids and stimulants, including the following drugs, their salts and/or enantiomers, as a single active ingredient or as a combination product, except where indicated otherwise. The noted product names are examples and the list is not inclusive. Some drug names may not be listed if there are no currently marketed products available or if the product is new to the market. The list refers to brand names and generic formulations of each medication.

Benzodiazepines

- Alprazolam – XANAX
- Bromazepam
- Chlordiazepoxide – LIBRAX
- Clobazam
- Clonazepam – RIVOTRIL
- Clorazepate
- Diazepam – DIASTAT, VALIUM
- Flurazepam
- Lorazepam – ATIVAN
- Midazolam
- Nitazepam – MOGADON
- Oxazepam
- Temazepam – RESTORIL
- Triazolam

Opioids

- Partial Agonists
  - Buprenorphine – BUTRANS, SUBLOCADE, SUBOXONE
  - Butorphanol
  - Nalbuphine
- Agonists
  - Codeine – all preparations
  - Diacetylmorphine
  - Diphenoxylate – LOMOTIL
  - Fentanyl – FENTORA, DURAGESIC
  - Hydrocodone – DALMACOL
  - Hydromorphone – DILAUDID, HYDROMORPH CONTIN
  - Meperidine – DEMEROL, PETHIDINE
  - Methadone – METADOL, METADOL-D, METHADOSE
  - Morphine – KADIAN, M-ESLON, MS CONTIN, MS IR
  - Normethadone – COPHYLAC
  - Oxycodone – OXY IR, OXYNEO, SUPEUDOL, TARGIN
  - Remifentanil
  - Sufentanil
  - Tapentadol – NUCYNTA
  - Tramadol – DURELA, RALIVIA, ZYTRAM

Anabolic Steroids and Their Derivatives

- Prasterone – INTRAROSA
- Testosterone – ANDRODERM, ANDROGEL, NATESTO, TESTIM, DELATESTRYL

Tibolone - TIBELLA

Barbiturates
- Butalbital – FIORINAL, TECNAL, TRIANAL
- Phenobarbital – PHENOBARB
- Primidone

Stimulants
- Amphetamine Base
  - Amphetamine – ADDERALL
  - Dextroamphetamine – DEXEDRINE
  - Lisdexamfetamine – VYVANSE
- Non-Amphetamine Base
  - Methylphenidate – BIPHENTIN, CONCERTA, FOQUEST, QUILLIVANT

Hypnotics
- Chloral Hydrate
- Daridorexant – QUVIVIQ
- Lemborexant – DAYVIGO
- Zolpidem – SUBLINOX
- Zopiclone (including eszopiclone) – IMOVANE, LUNESTA

Gabapentinoids
- Gabapentin – NEURONTIN
- Pregabalin – LYRICA

Muscle Relaxants
- Baclofen

Antispasmodic Agents
- Oxybutynin - DITROPAN

Miscellaneous
- Cocaine
- Ketamine (including esketamine) – KETALAR, SPRAVATO
- Nabilone – CESAMET

Monitored Veterinary Medications with No Marketed Agent Indicated for Humans
- Alpha-2 Agonists
  - Detomidine
  - Xylazine
- Miscellaneous
  - Pentobarbital

APPENDIX B

Register for "In Office" Use of Monitored Drugs of the Prescription Review Program

	Prescription Date			Name of Drug		
	Prescription Number			Strength of Drug		
	Prescriber Name			Form of Drug		
				Quantity of Drug		

Date	Patient Name	Dentist Name	Dental Condition	Dental Treatment	Quantity of Drug Administered	Quantity of Drug Remaining