

Bill 41 Regulations – Issue and Options Analysis

Issue #4: Pharmacist Profiles



Options Paper
September 8, 2009 (revised)

Introduction and Background

PricewaterhouseCoopers LLP (“PwC”) has been engaged to work with the Manitoba Pharmaceutical Association (“MPhA”) and the Manitoba Society of Pharmacists (“MSP”) to assist with building consensus around thirteen issues identified by the Steering Committee (see Appendix A) with respect to the Bill 41 regulations, thereby facilitating progress towards approval of the regulations.

On March 5, PwC facilitated a Stakeholder Mapping Workshop that was attended by members of the Steering Committee and a representative of Manitoba Health and Healthy Living. This workshop resulted in validation of the key stakeholders and a documented understanding of which stakeholder organizations/groups were perceived to be most interested in being engaged in consultations regarding each of the thirteen issues.

On April 7, 2009, PwC facilitated a full-day retreat (“Retreat”) involving several representatives of MPhA and MSP, and a representative of MHHL. During the retreat, PwC facilitated a series of discussions regarding twelve of the thirteen identified issues; the “Distance Care” issue was not addressed during the retreat because it was deemed too complex for productive discussion within the time available. During the Retreat, MSP and MPhA agreed upon specific action plans for seven of the twelve issues that were discussed; MSP and MPhA also agreed that further facilitated consultation was merited in relation to the other five issues discussed at the Retreat.

The five issues that will be discussed in a series of Focus Groups are the following:

- Tele-pharmacy;
- Pharmacy Technicians;
- Pharmacists Prescribing, which will be discussed in combination with Extended Practice Pharmacists & Specialty Care Practice; and
- Inducements.

The seven issues for which an action plan was agreed at the Retreat are as follows:

- Central Fill Component;
- Personal Health Information Number (“PHIN”);
- Practice Directions / Standards of Practice;
- Professional Liability Insurance;
- Record Keeping;
- Pharmacy Manager Qualifications; and
- Pharmacist Profiles.

With the agreement of the Steering Committee, the information presented herein will be used to develop an implementation plan that could ready the issue for a member vote.

Overview of Issue

The Pharmacist Profiles regulations enable and require the Registrar to prepare, make available to the public, and maintain a register that contains certain information on each of the MPhA’s members. Some form of Pharmacist Profile register has been adopted in most Canadian jurisdictions, with the register generally being accessible by the public, either in whole or in part. Implementation of a member profile register is also a requirement for other health professionals in Manitoba.¹

¹ The Registrar notes that the sections that were included in the December 2007 Draft Regulations Policy Document were taken, mostly, from the regulations under the Medical Act, as advised by Manitoba Health. These particular regulations do not require the approval of the members, but Council felt it important to have the consideration and feedback of the members.

The primary issue raised with respect to Pharmacist Profiles regulations is the process that will be used to validate the information contained in the profiles. Certain stakeholders have insisted that Members be provided an opportunity to review their individual profiles for accuracy before the the Profile contents are shared with other members and the Public; additionally, some stakeholders would prefer that, by default, a member's sex not be published, versus publishing a member's sex unless the member specifically requests that it not be published.²

Options Paper

The remainder of this document provides information and background related to this issue. Specifically, the following information has been provided:

- **Suggested Course of Action:** A summary of the course of action which has been agreed to by the MPhA Council and the MSP Board;
- **Summary of Positions:** A summary of the positions of MPhA, MSP, and the Government of Manitoba has been provided. This summary identifies each stakeholder's high-level concerns and/or opinions following a Retreat held with the MPhA Council, the MSP Board, and a representative of MHL in April 2009;
- **Jurisdictional Comparison:** A high-level summary of how other jurisdictions in Canada have addressed and/or are addressing the issue; and
- **Background:** The background document provides additional detail regarding the issue, including pertinent sections of the proposed draft regulations, detailed information on stakeholder concerns and/or positions; and a more detailed summary of how other Canadian jurisdictions address the issue.

Suggested Course of Action

At the April Retreat, MSP and MPhA agreed upon the following Action Plan.

Proposed Action Plan:

MPhA will design specific processes to collect the information that will be included in the pharmacist profiles, to create the initial profiles, and to update/maintain the profiles.

The process will consider the following:

- Maintain alignment with the processes adopted by other regulated healthcare professions.
- Members will submit the information that is to be included in the member's initial profile, observing guidelines established and provided by MPhA.
- MPhA will post the original, draft profiles in a confidential environment and allow each member an opportunity to review their profile before making the profile available to the public. Members will have already had the opportunity to specify whether their sex will be included on their profile (provision for such is already included in the current draft of the regulations).
- At an appropriate time, MPhA will notify members that there is a finite window of time during which members may review their (draft) profiles and request corrections/changes; at the end of the specified review period, the profile(s) will be released to the public.

The above Action Plan does not require any changes to the December 2007 Draft Regulations.

² Section 20(2) of the Draft Regulations states that *Council must not include a member's sex in his or her profile under clause (1)(b) if the member requests, in writing, that this information not be included.*

Bill 41 Regulations – Issue and Options Analysis
Issue #4: Pharmacist Profiles

The agreed Action Plan is in alignment with policies implemented in all other Canadian jurisdictions that were included in PwC's jurisdictional review; however, the jurisdictional review did not consider the processes used to create and maintain the profile registers; it only considered the existence and access to the register.

In PwC's view, there may be opportunities for the MPhA Council and the MSP Board to benefit from lessons learned by other jurisdictions that have already developed processes for creating and maintaining the Pharmacist Profile register; similarly, lessons-learned and insight might be obtained from the colleges of other health care professions within the Province of Manitoba.

Issue #4: Pharmacist Profiles

Summary of Positions

MPhA Council	MSP Board	MHHL
<ul style="list-style-type: none"> ▪ Government expects that the Profile content will be the same for all regulated health professionals. ▪ MPhA was instructed by Government that the content of pharmacist profiles be consistent with the profiles implemented for other healthcare professions. ▪ MPhA is looking to MSP to assist with allaying any fear that MPhA would post inappropriate information in the profiles; only information provided by the pharmacist (to whom the profile belongs) will be posted. ▪ Section 20(2) of the December 2007 draft Regulations already permits the member to request the member’s sex not be included on the profile. ▪ This section of the regulations only requires the approval of Council, but MPhA would like the input of the MSP. 	<ul style="list-style-type: none"> ▪ MSP supports all of the recommendations made in their position statement. ▪ MSP does not disagree with the proposed content for the profiles; MSP’s concerns pertain to the processes that will be used to collect and publish the information. ▪ MSP is proposing that a pharmacist’s sex not be included in a pharmacist’s profile by default; MSP prefers that a pharmacist’s sex only be included if a pharmacist specifically requests that it be included. ▪ MSP would like each pharmacist to have an opportunity to review their own profile before it is made available to the public (versus only providing members with an opportunity to preview or review their profile upon request). 	<ul style="list-style-type: none"> ▪ Expect pharmacist profiles to be consistent with profiles implemented for other healthcare professionals. ▪ Expect the process for compiling and publishing pharmacist profiles to be transparent and timely. ▪ Both MPhA and MSP can provide support to ensure all Pharmacists have the opportunity to validate the information in their personal profiles before it is made available to the public.

Note: the Action Plan that was agreed upon by MPhA Council and MSP Board at the April 7 Retreat is documented in the *Suggested Course of Action* section on Page 3.

Jurisdictional Comparison

	Ontario	Saskatchewan	Alberta	British Columbia
Are Pharmacist Profiles Public?	<ul style="list-style-type: none"> ▪ Yes. 	<ul style="list-style-type: none"> ▪ Yes. 	<ul style="list-style-type: none"> ▪ Yes. 	<ul style="list-style-type: none"> ▪ Yes.
Regulatory Instrument	<ul style="list-style-type: none"> ▪ OCP Bylaws Article XII – The Register. 	<ul style="list-style-type: none"> ▪ SCP Privacy Policies – Personal Information. 	<ul style="list-style-type: none"> ▪ Health Professions Act Section 41: Pharmacists Profession Regulation. 	
Details and Limitations (if applicable)	<ul style="list-style-type: none"> ▪ A certain amount of information must be contained in the public portion of the Register pursuant to subsection 23(3) of the Code. 	<ul style="list-style-type: none"> ▪ The Pharmacy Act requires the Registrar to comply with a request from any person to inspect the information contained in the Register (e.g., name, address, etc.). ▪ The College will not disclose other personal information about a Pharmacist unless the member provides express written consent. 	<ul style="list-style-type: none"> ▪ The College may disclose the information collected under subsection (1) with the consent of the regulated member whose information it is, or in a summarized or statistical non-identifiable form. 	<ul style="list-style-type: none"> ▪ A public directory of registered Pharmacists is available on the Association’s website.

Background

Issue #4: Pharmacist Profiles	
Draft Pharmaceutical Regulations: Policy Document, December 3, 2007	
Council must make pharmacist profiles available	<p>18(1) Beginning January 1, 2009, the council must make available to the public a profile of each member who:</p> <ul style="list-style-type: none"> (a) is registered on either the register of pharmacists or the conditional register; and (b) holds a current pharmacist license of any category. <p>As an exception, if the council reasonably believes that a licensed member is not currently practicing in Manitoba, it need not make available a profile of that member.</p>
Profile to be maintained while license suspended	<p>18(2) Despite subsection (1), the council must make available the profile of a pharmacist whose license to practice is suspended and, in such a case, the profile must be revised to note the suspension and the date on which it began.</p>
How profiles are to be made available	<p>19(1) A pharmacist profile must be made available to the public through:</p> <ul style="list-style-type: none"> (a) the college website; (b) orally in response to a telephone inquiry; or (c) in writing in response to a written request or telephone inquiry.
College may enter into agreement for assistance	<p>19(2) The College may enter into an agreement with the government or any person, organization or entity, including a public or private sector organization or entity, for assistance in making pharmacist profiles available.</p>
Profile content	<p>20(1) Each profile must contain the following information about the member and his or her practice in Manitoba and elsewhere:</p> <ul style="list-style-type: none"> (a) the member's current name as shown on the applicable register; (b) subject to subsection (2), the member's sex; (c) the current address at which the member primarily conducts his or her practice; (d) the name of the pharmacy education program from which the member graduated, and the

Issue #4: Pharmacist Profiles	
	<p>year of his or her graduation;</p> <ul style="list-style-type: none"> (e) the date of the member's initial registration in Manitoba; (f) the member's current category of pharmacist license; (g) subject to subsections (3) and (4), the date and a brief description of any final disciplinary action taken against the member since January 1, 2004 by the body named in the profile as regulating the profession that the member is or has been licensed to practice, whether in Manitoba or elsewhere, and if the member has initiated an appeal respecting the disciplinary action; (h) any current restrictions, terms or conditions imposed on the member's registration or licence, including any geographic or practice restrictions pending qualification for full registration, but not including information respecting restrictions, terms or conditions imposed as part of final disciplinary action that is already included in the profile under clause (h); (i) the commencement date of any current interim suspension from the practice of pharmacy imposed on the member; (j) any current certification of the member as a specialist or an extended practice pharmacist; (k) subject to subsection (6), the date of any malpractice court judgment issued against the member by a court in any jurisdiction since January 1, 2004 , the name of the court that issued it, and if the member has initiated an appeal respecting the malpractice judgment; (l) a description of any offence under <ul style="list-style-type: none"> (i) the Criminal Code (Canada); (ii) the Controlled Drugs and Substances Act (Canada); or (iii) the Food and Drugs Act (Canada), of which the member has been convicted within the past 10 years, if the council determines that the conviction is reasonably relevant to the member's competence or to the safe practice of pharmacy . The description must include the date of the conviction and the name of the court imposing the conviction, and if

Issue #4: Pharmacist Profiles	
	the member has initiated an appeal respecting the conviction.
Information re member's sex not to be included on request	20(2) The council must not include a member's sex in his or her profile under clause (1)(b) if the member requests, in writing, that this information not be included.
Limits on including information re disciplinary action	<p>20(3) The council must not include in a member's profile information about</p> <ul style="list-style-type: none"> (a) any final disciplinary action taken against him or her before January 1, 2004; (b) any final disciplinary action taken against him or her on or after January 1, 2004, and before January 1, 2009, if the tribunal issuing it ordered that the member's name not be published for any reason; and (c) any final disciplinary action taken against him or her on or after January 1, 2009, if the tribunal issuing it ordered that the member's name not be published.
Limit on including information regarding disciplinary action under appeal	<p>20(4) If the council includes information in a member's profile about a final disciplinary action taken against him or her, it must not do so before the earliest of the following dates:</p> <ul style="list-style-type: none"> (a) the date on which any right the member has to appeal the disciplinary action expires; (b) the date on which the member initiates an appeal respecting the disciplinary action; or (c) the date on which the member waives his or her right to appeal the disciplinary action. <p>As an exception, if before any of those dates has passed, information about the final disciplinary action has been published by the council under section 58 of the Act, or has been made available to the public by another tribunal which took the final disciplinary action, the published or publicly available information must be included in the pharmacist profile.</p>
Malpractice judgment information not to be included until appeal period expires	20(5) The council must not include any information about a malpractice court judgment in a member's profile under clause 20(1)(1) until any period available to the member to appeal the judgment has expired.
Voluntary information	21 A member may provide information to the council about any or all of the following matters, for inclusion in

Issue #4: Pharmacist Profiles	
	<p>his or her profile:</p> <ul style="list-style-type: none"> (a) telephone number of his or her place of practice; and (b) languages spoken (including American Sign Language).
Explanatory Information	22 The Council may include in pharmacist profiles any explanatory information about pharmacist profiles and the categories of information specified in subsection 20(1) that it considers appropriate.
Required information	23 A member must provide to the registrar complete and accurate information about the member relating to each category of information specified in subsection 20(1), at the time required by the registrar and in a form satisfactory to the registrar.
Change in information in a required category	24(1) If, for any reason, information in a member's profile in a category specified in subsection 20(1) becomes inaccurate or incomplete, the member must, within 30 days, provide accurate and complete information to the registrar in a form satisfactory to the registrar.
Change in information provided voluntarily	24(2) A member may, at any time, provide to the registrar updates to the information provided voluntarily under section 21.
Registrar to revise pharmacist profile	24(3) Within 30 days after receiving information under subsection (1) or (2), the registrar must revise the member's profile if he or she reasonably believes that the information is accurate.
Registrar must notify the member of the change	24(4) If the registrar receives information about a member relating to a category of information under subsection 20(1) or information provided voluntarily under section 21 from a source other than the member, and takes reasonable steps to insure the information is accurate, the registrar must notify the member of the changes therein 60 days prior to posting.
Profile provided to member before publication on request	25(1) If a member requests an opportunity to review his or her profile before it is made available to the public, the registrar must promptly provide the member with a copy of the profile. At the request of the member, the registrar may satisfy this requirement by providing an electronic version of the profile.
Member may dispute information	25(2) Within 60 days after receiving a copy of his or her profile under subsection (1), the member may dispute

Issue #4: Pharmacist Profiles	
	<p>the factual accuracy of any information in it by submitting to the registrar:</p> <ul style="list-style-type: none"> (a) a written statement detailing the basis of the dispute; and (b) any other information that the member considers relevant to the dispute. <p>The onus of proving that the information is factually inaccurate is on the member.</p>
Registrar may make profile available despite dispute	<p>25(3) Despite subsection (2), receipt of a written statement disputing the factual accuracy of information does not affect the registrar's ability to make a pharmacist profile available. However, until a final determination is made under subsection (4), the profile</p> <ul style="list-style-type: none"> (a) must not include the disputed information; and (b) must include a statement in the relevant category that information in the category is under dispute and is not currently available.
Determination of dispute	<p>25(4) Upon receipt of a written statement of dispute under subsection (2), the council must review the statement and any other information provided by the member that is relevant to the dispute and</p> <ul style="list-style-type: none"> (a) revise the information in the profile, if the council determines that the member's position on the dispute is correct; or (b) if the council determines that the member's position on the dispute is incorrect, include the information in the relevant category of information in the profile with a statement that the member disputes the information.
If member fails to provide information	<p>26 If a member fails to provide information as required under this part the registrar may note the failure on the member's profile.</p>
If member provides false, inaccurate or incomplete information	<p>27 A member must not willfully provide false, inaccurate or incomplete information under this part.</p>
Review of regulation	<p>28 Not later than January 1, 2015 , the minister and the council must review the effectiveness of this part, and, in the course of the review, consult with any persons affected by this regulation hat the minister or the council considers appropriate. On completion of the review, the minister may, if he or she considers it advisable, recommend to the Lieutenant Governor in Council that this part be amended or repealed.</p>

Issue #4: Pharmacist Profiles	
Positions	
MPhA Council Position / Comments³	<p>Meeting: Retreat April 7, 2009</p> <ul style="list-style-type: none"> ▪ Government expects that the Profile content will be the same for all regulated health professionals. ▪ MPhA was instructed by Government that the content of pharmacist profiles be consistent with the profiles implemented for other healthcare professions. ▪ MPhA is looking to MSP to assist with allaying any fear that MPhA would post inappropriate information in the profiles; only information provided by the pharmacist (to whom the profile belongs) will be posted. ▪ Section 20(2) of the December 2007 draft Regulations already permits the member to request the member's sex not be included on the profile. ▪ This section of the regulations only requires the approval of Council, but MPhA would like the input of the MSP.
MSP Board Positions / Comments³	<p>Meeting: Retreat April 7, 2009</p> <ul style="list-style-type: none"> ▪ MSP supports all of the recommendations made in their position statement. ▪ MSP does not disagree with the proposed content for the profiles; MSP's concerns pertain to the processes that will be used to collect and publish the information. ▪ MSP is proposing that a pharmacist's sex not be included in a pharmacist's profile by default; MSP prefers that a pharmacist's sex only be included if a pharmacist specifically requests that it be included. ▪ MSP would like each pharmacist to have an opportunity to review their own profile before it is made available to the public (versus only providing members with an opportunity to preview or review their profile upon request). <p>Document: MSP Position Statement (December 9, 2008)</p> <p>The Manitoba Society of Pharmacists supports including information on profile statutory offences, disciplinary actions, and malpractice court judgments</p>

³ See the Suggested Course of Action section on Page 3 for a summary of the Action Plan that was agreed upon by MPhA Council and MSP Board at the April 7 Retreat.

Issue #4: Pharmacist Profiles	
	<p>(as described in the discussion document) for a period of less than 5 years.</p> <p>Pharmacists are able to request that their sex not be included in their profile. However, rather than requiring pharmacists to provide a written request, those who want this information included should be allowed to voluntarily provide this information similar to voluntarily providing a telephone number of his or her place of practice or voluntarily providing languages spoken (section 21).</p> <p>The Manitoba Society of Pharmacists supports the Regulations Advisory Committee's recommendation that MPhA consider methods to track and analyze how frequently the profiles are being assessed.</p> <p>Although as currently proposed the regulations allow pharmacists to request a copy of their profiles prior to making them available to the public, there is almost unanimous support for MPhA initially providing each pharmacist a copy of his or her profile in advance. The Manitoba Society of Pharmacists believes MPhA should adopt a policy of providing each pharmacist with a copy of his or her initial profile and a reasonable period to review it and request changes before it becomes available to the public.</p>
MHHL³	<p>Meeting: Retreat April 7, 2009</p> <ul style="list-style-type: none"> ▪ Expect pharmacist profiles to be consistent with profiles implemented for other healthcare professionals. ▪ Expect the process for compiling and publishing pharmacist profiles to be transparent and timely. ▪ Both MPhA and MSP can provide support to ensure all Pharmacists have the opportunity to validate the information in their personal profiles before it is made available to the public.
MSP Survey	<p>Document: MSP Position Statement (December 9, 2008)</p> <ul style="list-style-type: none"> ▪ 64 percent of respondents did not believe a member's sex should be included in profiles; ▪ Only 49 percent of respondents support including in a pharmacist's profile for 10 years, offences under such statutes as the Criminal Code, of which a member has been convicted; ▪ 47 percent of respondents do not support including malpractice court judgments issued against a pharmacist for a 10 year period;

Issue #4: Pharmacist Profiles	
	<ul style="list-style-type: none"> ▪ 45 percent of respondents do not support including disciplinary action taken against a pharmacist for a 10 year period; and ▪ In excess of 90 percent of respondents believe that a pharmacist should have an opportunity to review his or her profile and should be provided a copy prior to it being made available to the public.
MPhA Survey	<p>Response to April 2007 Discussion document: ⁴</p> <ul style="list-style-type: none"> • Section 18 received an 87% approval by responding member • Section 19 received an 83% approval by responding member • Section 20 received an 80% approval by responding member • Section 21 received an 95% approval by responding member • Section 22 received an 77% approval by responding member • Section 23 received an 93% approval by responding member • Section 24 received an 74% approval by responding member • Section 25 received an 82% approval by responding member • Section 26 received an 93% approval by responding member • Section 27 received an 98% approval by responding member • Section 28 received an 99% approval by responding member <p>Response to July 2007 Discussion document: ⁴</p> <ul style="list-style-type: none"> • Section 20(3) received an 92% approval by responding member • Section 24(4) received an 72% approval by responding member • Section 25(2) received an 75% approval by responding member

⁴ It is noteworthy that the surveys conducted by MPhA asked members whether they were in favor of the *intent* of the referenced section.

<p>MPhA Regulations Advisory Committee (April 2007)</p>	<p>Document: Amalgamation of the decisions and suggestions of the RAC and the Respective decisions of Council</p> <p>19 (1) specifies how pharmacist profiles must be made available, and council should consider methods to track and analyze how frequently the profiles are being accessed. This should help to address regulation 28. Some Committee members were concerned the profile system would be used for unwanted solicitation of pharmacists.</p> <p><i>Although the recommendation was approved and it be (sic) a task for Council to do, this will no be included in the regulations document.</i></p> <p>Regulation 24 (4) should be revised to indicate that if a member's profile is being revised, the member should be notified of the significant changes prior to posting.</p> <p>Some Committee members felt strongly that members should be notified of significant changes to their profile prior to posting because of the potential negative effect of posting incorrect information. However, for minor or "cosmetic" changes, prior notification was not needed.</p> <p><i>Council approved the recommendation of the RAC that section 24 (4) be changed to indicate that if a member's profile is being revised, the member should be notified of the significant changes prior to posting.</i></p>
<p>Inducements in Other Jurisdictions</p>	
<p>Ontario</p>	<p>OCP Bylaws Article XII – The Register</p> <p>12.4 Public Information. Subject to Article 12.2 and Article 12.5, the information contained in the Register as provided for by Article 12.1 and Article 12.3 shall be information available to the public from the Register under paragraph 4 of subsection 23(3) of the Code (4).</p> <p>4 A certain amount of information must be contained in the public portion of the Register pursuant to subsection 23(3) of the Code. It includes:</p> <ul style="list-style-type: none"> ▪ each members name, business address and business telephone number and, if applicable, the name of each health profession corporation in which he or she is a shareholder; ▪ each members class of registration; ▪ the terms, conditions and limitations imposed on each certificate of registration; ▪ a notation of every revocation and suspension of a

	<p>certificate of registration;</p> <ul style="list-style-type: none"> ▪ the name, business address and business telephone number of every health profession corporation; ▪ the names of the shareholders of each health profession corporation; ▪ a notation of every revocation and suspension of a certificate of authorization; ▪ the results of every disciplinary and incapacity proceeding completed within six years before the time the register was prepared or last updated: <ol style="list-style-type: none"> 1. in which a member’s certificate of registration was revoked or suspended or had terms, conditions or limitations imposed on it, or 2. in which a member was required to pay a fine or attend to be reprimanded or in which an order was suspended if the results of the proceeding were directed to be included in the register by a panel of the Discipline or Fitness to Practice Committee. ▪ the results of every disciplinary proceeding, completed at any time before the time the register was prepared or last updated, in which a member was found to have committed sexual abuse, as defined in clause 1 (3) (a) or (b) of the Code; ▪ information described in clause (2) (e.1) related to appeals of findings of the Discipline Committee; (3.2) and (2)(e.1); and ▪ information designated as public in the by-laws. <p>(4) In addition, by virtue of subsection 23(7), the word “result” is defined as follows: “‘result’, when used in reference to a disciplinary or incapacity proceeding, means the panel’s finding, particulars of the grounds for the finding, and the penalty imposed, including any reprimand.”</p>
<p>Saskatchewan</p>	<p>SCP Privacy Policies</p> <p>Personal Information</p> <p>23) “The Pharmacy Act, 1996 requires the Registrar to comply with a request from any person to inspect the information contained in the register established pursuant to the Act.</p> <p>This public register includes the disclosing the name, address (practice or employment site only) and registration or membership category of every member or intern.</p> <p>Under the Act, the College must also annually file the</p>

	<p>public register with the government.</p> <p>To confirm identify as part of the membership category data, the College also discloses the member or intern number to the government.</p> <p>The College will not disclose any other personal information unless the member or intern provides express written consent.</p>
<p>Alberta</p>	<p>Section 41 of the Pharmacists Profession Regulation under the Health Professions Act regulates Providing Information.</p> <p>A regulated member must provide personal, professional and other information to the Registrar at the College, as detailed in subsection (1) of the Section.</p> <p>Subsection (6): Subject to section 34(1) of the Act, the College may disclose the information collected under subsection (1) with the consent of the regulated member whose information it is, or in a summarized or statistical form so that it is not possible to relate the information to any particular identifiable individual.</p>
<p>British Columbia</p>	<p>A public directory of registered Pharmacists is available on the Association’s website. Information regarding this register is limited.</p>