



Centre for Addiction and Mental Health
Centre de toxicomanie et de santé mentale

**Centre for Addiction and
Mental Health**

1001 Queen St. West
Toronto, Ontario
Canada M6J 1H4
Tel: 416.535.8501

**Centre de toxicomanie et
de santé mentale**

1001, rue Queen Ouest
Toronto, Ontario
Canada M6J 1H4

www.camh.net

CPSO DRUGS AND PRESCRIBING POLICY REVIEW

February 3, 2011

*A PAHO/WHO Collaborating
Centre*

*Un Centre collaborateur
OPS/OMS*

*Affiliated with the
University of Toronto*

*Affilié à l'Université
de Toronto*

This document outlines a number of suggestions for the review of drug and prescribing policies of the CPSO. We are grateful for the opportunity to provide input into this policy review and we would be pleased to provide further information if required.

CAMH recommends that the following overarching principles be included in the revised drug and prescribing policy document

- Problematic substance use is a health issue and addiction is a recognized medical condition for which treatment is available.
- Individuals with mental illness and/or substance use problems should have equitable access to all health services, regardless of whether they use or misuse prescription drugs or other substances.
- Addressing the health issues of those with mental illness and/or substance use problems requires the full range of approaches including health promotion, prevention, treatment and harm reduction.
- Interventions to address the health issues of those with mental illness and/or substance use problems should be based on the best available evidence.
- Health care is increasingly delivered within interprofessional teams. CPSO policies should be applicable and relevant to physicians working in the full range of practice settings, including sole practices, interprofessional teams, hospitals, etc.
- Regardless of practice setting, establishment and maintenance of good communications with pharmacists should be emphasized and encouraged.

CAMH recommends that the following be included in Prescribing Practices Policies

There are recent and upcoming provincial policy changes that relate to prescribing, including a statute that allows for the monitoring of prescribing in Ontario and the development of e-prescribing programs through eHealth Ontario. CPSO policies should include the requirement that physicians participate in these programs once they are enacted.

Most people who seek help for mental illness and/or substance use problems go to their primary care physician. Physicians should be encouraged to seek the advice of experts in psychiatry and addiction medicine when the case before them presents with issues beyond their area of expertise and experience.

When patients are treated by physicians in emergency departments, walk-in clinics, etc. every effort should be made to share information about the medications prescribed with the patient's primary care physician.

CAMH recommends that the drug and prescribing policies include the following information on the prescribing of controlled drugs

Drugs controlled under the *Controlled Drugs and Substances Act* (CDSA) include pain relievers, sedatives, hypnotics, stimulants and many others. Regulations related to the CDSA govern benzodiazepines and other targeted substances, narcotics and medical marijuana. Policies regarding the prescribing of these substances should include information for the physician on the relevant regulations for benzodiazepines and other targeted substances, narcotics and medical marijuana. The policies should explain where the regulations come from, why they are important and which medications they apply to.

Physicians who prescribe controlled drugs need to ensure that they are not increasing harm to the person under their care. Many of these medications have the potential to produce dependency or addiction and are susceptible to misuse. Physicians should be encouraged to conduct a thorough medical exam including screening for substance use problems and mental illness and a risk assessment. Guidelines that exist for treatment of specific illnesses and/or medications (e.g., *Canadian Guidelines for the Safe and Effective Prescribing of Opioids for Chronic Non-Cancer Pain*) should be followed. Physicians who prescribe these medications should also consider additional procedures such as ensuring a back-up physician is available when the original physician is away, having the patient use one pharmacy for their medications, using a treatment agreement when appropriate and establishing appropriate monitoring of the patient while on the controlled medication.

CAMH recommends that the drug and prescribing policies include the following information on prescription drug abuse

The current policy on prescription drug abuse makes a distinction between legitimate and illicit reasons patients seek prescriptions for narcotic and controlled drugs. It categorizes "supporting their addiction" as well as diverting and dealing in prescription drugs as illegitimate reasons for seeking prescription drugs. This does not allow for the possibility that those with a substance use problem have related medical conditions, such as problems with pain in those who are opioid dependent. It should also be acknowledged that addiction is a recognized medical condition with proven treatment options.

The current policy aims to inform physicians of the relevant legislation and "clarify for physicians their obligations where there may be concerns about possible prescription drug abuse on the part of patients". Physicians are faced with questions about the use and misuse of controlled medications every day in their practices and this policy can be

a very important tool for physicians. Therefore this policy should emphasize the importance of preventing a patient from developing a substance use problem, how to address and treat the problem, as well as the underlying medical condition for which they have sought the physician's assistance. Current treatment options include substitution treatments such as methadone and buprenorphine.

The policy should outline the difference between those who seek prescribed drugs for their own use and those who intent to divert and sell the medication. The policy should encourage physicians to conduct a thorough medical exam, including screening for substance use and mental health history, a risk assessment and offer treatment when appropriate. The policy should encourage physicians to seek the advice of an addiction medicine specialist or a psychiatrist when the issues presented by the patient are outside the realm of the physician's expertise and/or experience.

The policy should clearly define the terms used (e.g., narcotic), explain the relevant legislation and clearly reference regulations governing the prescribing of controlled drugs.

For more information regarding this submission, please contact:

Barney Savage
Director of Public Policy
Centre for Addiction and Mental Health
416-535-8501, ext. 2129
barney_savage@camh.net