

Alberta College of Pharmacy's 'Moving Pharmacy Practice Forward' Release Faces Contradictions: : A Response fom ACPA

Pharmacists' role in aesthetic treatments under fire, as Alberta Cosmetic Pharmacist Association calls for expanded practice.

EDMONTON, AB, CANADA, June 15, 2023 /EINPresswire.com/ -- The Alberta College of Pharmacy has released a statement entitled "[Moving pharmacy practice forward](#)," stating, "The draft standards propose a requirement that regulated members not hold themselves out as a regulated member

when providing services that fall under the Personal Health Services regulation. [Schedule 19](#), section 3(1) or 3(2) of the [Health Professions Act \(HPA\)](#) defines the roles of pharmacists or pharmacy technicians in their practices, and the provision of restricted activities outside of these defined practices is not appropriate. This means that the administration of injections for aesthetic purposes is not enabled. Authorized restricted activities for regulated members and their use must be interpreted and applied in context and conjunction with these sections of the HPA. Within Canada, six provinces specifically do not authorize pharmacists to provide injections for aesthetic purposes and the remaining provinces have not enabled the practice."

A comprehensive email was sent today to the Alberta College of Pharmacy (ACP) by Dr. Alhallak, President of the Alberta Cosmetic Pharmacist Association, questioning the ACP's recent interpretation of the Health Professions Act (HPA) that effectively restricts pharmacists from administering aesthetic injections.

Dr. Alhallak argues in his letter that the ACP's current stance is too narrow, potentially stifling the evolution of pharmacists' roles in healthcare. He stresses that Schedule 19 of the HPA, which outlines the scope of pharmacists' practice, describes pharmacists as health promoters, educators, and preventive care specialists, not just medication dispensers. Dr. Alhallak believes this extensive skill set could be further utilized in areas like aesthetic treatments, with proper training and professional development.



Alberta College Pharmacist Association Logo

To bolster his argument, Dr. Alhallak compares the roles of pharmacists, physicians, and registered nurses as defined in Schedules 19, 21, and 24 of the HPA, respectively. He highlights the shared mandate of health promotion, research involvement, treatment provision, and education across all three professions, suggesting that pharmacists should be allowed to extend their roles beyond traditional bounds.

Dr. Alhallak also challenges the ACP's reference to other provinces' regulations, noting that healthcare needs and services vary by province and that Alberta has often pioneered unique approaches to healthcare.

In his letter, Dr. Alhallak clarifies the difference between esthetic and aesthetic procedures, as defined by Alberta's Personal Services Regulation, asserting that the latter requires medical knowledge and training, both of which pharmacists possess.

The email to the ACP represents a strong plea to re-evaluate the HPA's interpretation and consider the potential benefits of expanding pharmacist services. As healthcare continues to evolve, Dr. Alhallak stresses the importance of maximizing the potential of all health professionals, including pharmacists, to ensure the highest level of care for all Albertans.

Here is the full email "Dear Alberta College of Pharmacy,

I hope this email finds you well.

I write to you with the utmost respect for your role as a regulatory body, aiming to uphold high standards of practice to ensure public safety. However, I would like to bring to your attention a concern regarding your current interpretation of the Health Professions Act (HPA), specifically Schedule 19 pertaining to the practice of pharmacists. In yesterday's publication dated June 14th, 2023, it is stated, "The draft standards propose a requirement that regulated members not hold themselves out as a regulated member when providing services that fall under the Personal Health Services regulation. Schedule 19, section 3(1) or 3(2) of the Health Professions Act (HPA) defines the roles of pharmacists or pharmacy technicians in their practices, and the provision of restricted activities outside of these defined practices is not appropriate. This means that the administration of injections for aesthetic purposes is not enabled. Authorized restricted activities for regulated members and their use must be interpreted and applied in context and conjunction with these sections of the HPA. Within Canada, six provinces specifically do not authorize pharmacists to provide injections for aesthetic purposes, and the remaining provinces have not enabled the practice."

HPA: Your interpretation suggesting that pharmacists should not administer injections for aesthetic purposes seems narrow and rigid and potentially inhibits the evolution of pharmacists' roles in healthcare. This interpretation seems to overlook some aspects of Schedule 19, which outlines that pharmacists are equipped with the skills, knowledge, and competencies to promote

health, prevent diseases, and provide advice and education, not just dispense medications. When comparing the roles and responsibilities as outlined in HPA Schedule 19 (Pharmacists and Pharmacy Technicians), Schedule 21 (Physicians, Surgeons, Osteopaths, and Physician Assistants), and Schedule 24 (Registered Nurses), it becomes clear that all three professions share common ground in health promotion, research involvement, provision of treatment and intervention, and education. Yet, the current interpretation of the HPA seems to limit pharmacists' roles to a far more traditional scope than these other health professionals.

I firmly believe that pharmacists, with proper training and continuous professional development, are more than capable of expanding their skillset to include aesthetic procedures.

As healthcare continues to evolve, I implore you to reconsider this interpretation of the HPA in light of the potential benefits expanded pharmacist services could bring to our communities, both from a health promotion and accessibility standpoint. This reconsideration could pave the way for a more collaborative and comprehensive approach to healthcare in Alberta, maximizing the capabilities of each health profession.

Personal Service regulation: It is also critical to make a distinction between aesthetic and esthetic procedures, particularly in light of Alberta's Personal Services Regulation. Esthetic procedures typically refer to beauty treatments, such as facials, manicures, pedicures, and other similar services, typically performed in salons and spas. Aesthetic procedures, on the other hand, encompass medically-based procedures aimed at enhancing, altering, or restoring a person's appearance. These can include treatments such as botulinum toxin injections, dermal fillers, and other minimally invasive procedures that alter physical appearance but are based on medical principles. According to the Personal Services Regulation in Alberta, these procedures require a comprehensive understanding of anatomy, pharmacology, and sterile techniques and hence necessitate the involvement of medically trained professionals. Therefore, pharmacists, with their rigorous training and medical background, can fit aptly into the provision of aesthetic services.

Other provinces: Pointing to regulations in other provinces as a reason to prohibit pharmacists from providing aesthetic treatments in Alberta is, in my view, a logically flawed argument. Each province has unique healthcare needs, demographics, and access issues, and thus, what works or doesn't work in one province should not be used as the sole yardstick for regulations in another. Moreover, Alberta has shown a history of paving its own way in healthcare, exemplified by the implementation of pharmacist-led walk-in clinics and non-pharmacist ownership of licensed pharmacies. As such, it seems counterproductive to curtail the potential expansion of pharmacists' roles based solely on the regulatory practices of other provinces.

Thank you for your time and consideration. I look forward to a constructive and open dialogue on this matter. I have attached the pdf file that has schedule 19, 21, and 24 side-by-side for your reference."

Communication Office

Alberta Cosmetic Pharmacist Association

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