



Handling, Administration and Dispensing of Controlled Substances

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1.0 PRACTICE POLICY STATEMENT

The CRTO considers it acceptable for a Respiratory Therapist (RT) to handle, administer and accept delegation to dispense controlled substances, provided that appropriate authorizing mechanisms are in place.

2.0 PURPOSE

The CRTO is committed to providing guidance surrounding the handling, administration and dispensing of controlled substance to its Members. The purpose of this policy is to provide a strong framework to enhance the understanding of the role that RT's hold to ensure public and patient safety in the use of narcotics in the healthcare environment.

3.0 APPLICABILITY & SCOPE OF POLICY

- RT's who hold an Active General or Graduate Certificate of Registration with the CRTO with no terms, conditions or limitations preventing them from performing any authorized acts, may handle, administer, and dispense controlled substances, provided they have a valid order. While the list is not specific, the CRTO's ***Interpretation of Authorized Acts*** Professional Practice Guideline (PPG) provides examples of medications that RT's may administer.

4.0 RESPONSIBILITIES

- **Scope of Practice and Competencies:** It is an expectation that any activity or procedure performed by an RT, including the administration of a controlled substance, falls within the RT's professional and personal scope of practice. As with any task undertaken as part of their clinical practice, an RT must also have the requisite knowledge, skills, and judgment (competencies).



- **Delegation to Dispense:** One of the 13 controlled acts in the *Regulated Health Professions Act (RHPA)* is “prescribing, dispensing, selling or compounding a drug...”. Since the *Respiratory Therapy Act (RTA)* does not authorize RTs to perform this controlled act, the authority to dispense medications must be delegated to an RT from another regulated health care professional that is authorized to dispense and to delegate dispensing. Dispensing occurs when an RT is required to select, prepare, package, and transfer stock medication for one or more prescribed medication doses to a patient for administration at a later time.
- The rules surrounding dispensing are the same regardless of the substance and the CRTC is of the position that there is nothing in current provincial or federal legislation to prevent an RT from receiving delegation to dispense a controlled substance. **Note:** RTs can accept delegation to dispense, but cannot receive delegation to prescribe, sell or compound a drug.
- **Authorization to Possess and Administer a Controlled Substance:** RTs can only obtain possession of a controlled substance through a prescription issued by an authorized practitioner; usually a physician (please note NP-ECs cannot currently prescribe a controlled substance). The *Controlled Drugs and Substances Act (CDSA)* states that physicians must name the individual patient in the prescription. Because of this restriction, medical directives for a broad range of patients cannot be used to gain possession of a controlled substance. Once the RT is in legal possession of the controlled substance, they may administer the medication via a direct order for a specific patient. **Note:** medical directives cannot be used to authorize the handling, administration or dispensing of a controlled substance.
- **Handling and Storage of Controlled Substances:** The *Narcotics Control Regulation (NCR)* [s.3 (1)] defines “a hospital employee” as someone who is authorized to handle a controlled substance (e.g., picking up narcotics from a pharmacy and transporting them to where they will be administered to the patient). Therefore, the CRTC interprets this to authorize RTs employed at a hospital to handle and transport controlled substances. It is important that RT’s, along with all practitioners and staff, play a role in the safety, security, and disposal of controlled substances to avoid narcotic diversion.

5.0 AUTHORITY & MONITORING

- A controlled substance is one that Health Canada has determined to have significant potential for addiction and abuse, including prescription medications and illegal street drugs.
- The possession, handling, dispensing and administration of controlled substances are governed primarily by federal legislation; the *Controlled Drug and Substances Act (CDSA)* and the *Narcotics Control Regulations (NCR)*.
- The *CDSA* lists all controlled substances, which includes narcotic analgesics (e.g. Fentanyl), non-narcotic controlled drugs such as benzodiazepines (e.g. Midazolam) and barbiturates (e.g. Phenobarbital).



- The *NCR* deals specifically with how hospitals and pharmacies are licensed to handle controlled substances.

6.0 RELATED DOCUMENTS

- [*CRTO's Standards of Practice*](#)
- [*CRTO's Administering and Dispensing PPG*](#)
- [*CRTO's Orders for Medical Care PPG*](#)
- [*Regulated Health Professions Act \(RHPA\)*](#)
- [*Respiratory Therapy Act \(RTA\)*](#)
- [*Drug and Pharmacies Regulation Act*](#)
- [*Narcotics Safety and Awareness Act*](#)
- [*Controlled Drugs and Substance Act and Regulation \(Health Canada\)*](#)

7.0 APPENDICES

Authorizing Mechanisms for Controlled Substances

	Medical Directive allowed?	Direct Order required? (i.e., patient specific)	Delegation required?
Handling (e.g., transporting)	No	Yes	No
Administration	No	Yes	No
Dispensing	No	Yes	Yes

8.0 CONTACT INFORMATION

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