



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

365 Bloor Street East, Suite 2003
Toronto, ON M4W 3L4
T : 416.226.9100
F : 416.226.9185
info@neighbourhoodpharmacies.ca
neighbourhoodpharmacies.ca

July 27, 2020

To whom it may concern,

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates this opportunity to respond to proposed amendments to the *General Regulation 202/94* of the *Pharmacy Act*, Part VII.3 (Controlled Acts) brought forward by the Ontario College of Pharmacists. These amendments, if approved, would authorize pharmacy professionals the expanded scope to:

1. Administer the influenza vaccine to children as young as 2 years old;
2. Renew prescriptions in quantities of up to a year's supply;
3. Administer certain substances by injection and/or inhalation for purposes that are in addition to patient education and demonstration.

The College's proposal also includes enabling amendments should government move forward with changes to regulations under the *Pharmacy Act* and *Laboratory and Specimen Collection Centre Licensing Act*. These amendments would support pharmacists' role in medication management and treatment of patients by enabling them to perform certain point of care tests (POCT). We are pleased to provide input on these proposed enabling amendments, and on allowing pharmacists to perform POCTs.

Pharmacists are routinely relied on by patients for advice and care as experts in drug therapies and medication management. They are often the most conveniently accessible and trusted health providers for their patients – a fact that has particularly emerged during the COVID-19 pandemic. Throughout the unfolding global health crisis, Ontario pharmacists have taken risks to serve their patients and communities every single day. Pharmacists and pharmacies are an essential link in our provincial health system and, for millions of Ontarians, pharmacies are the first and most frequent point of contact patients have with their healthcare team.

Proposed regulations

Neighbourhood Pharmacies broadly supports the efforts and progress made by government to create a healthier Ontario and put an end to hallway medicine. We particularly appreciated government's commitment in its 2019 budget, repeated in the 2019 Ontario Economic Outlook and Fiscal Review, that pharmacists should be enabled to use their education and training more effectively with an expanded scope of practice. We strongly feel this scope expansion will improve patient care, increase accessibility of care, and reduce strains on overburdened hospitals and primary care providers.

As noted above, pharmacy has emerged during the ongoing pandemic as Ontarians' preferred choice for a range of healthcare and daily living needs. Pharmacists are trusted, conveniently accessible, and expert health professionals – but there is more that they can do. The proposals put forward by the College to expand the scope of practice for pharmacists in Ontario will strengthen the health system and make life easier for Ontarians.

As a key stakeholder in Ontario's healthcare framework, Neighbourhood Pharmacies has engaged extensively with government, the College and its members to support and inform initiatives aimed to improve individual and population health. We are committed to expanding access and advancing care for Ontarians by creating capacity in our overburdened system. We believe that leveraging the accessibility, training, and expertise of pharmacists is critical to achieving this shared goal

We address each proposal in the submission below.

Administer the flu vaccine to children as young as two years old

The potential of a second wave of COVID-19 to coincide with flu season is deeply concerning. The strain this would place on the province's hospitals – and the impact on the economy – must be carefully considered by government as it makes plans for the fall. We anticipate that demand for seasonal influenza vaccination will be unprecedentedly high. At the same time, many Ontarians may be especially reticent to visit their physician's office or a public health clinic. Now more than ever, pharmacy has a critical role in protecting people from flu.

Since the inclusion of pharmacists in the Universal Influenza Immunization Program (UIIP) in 2012, patients welcome and embrace their local pharmacies as the preferred destination for receiving their flu vaccine. Recent data shows that 34% percent of Canadians receive the flu shot at their community pharmacy (exceeding the 30% who are receiving it at their physician's office¹. In 2019-20, community pharmacies in Ontario administered nearly 1.4 million doses of the flu vaccine to their patients. Together, these figures demonstrate how pharmacies have proven they are the most trusted, accessible, and convenient place for Ontarians to receive their flu vaccine. Pharmacists have become clear advocates for influenza immunization, and have the tools available to serve their patients accordingly. If appropriate conditions are in place to allow pharmacists to administer the flu vaccine, this proposal stands to positively impact the backlog in the healthcare system, especially in the context of the unfolding pandemic.

In the absence of any safety concerns relating to vaccinating patients as young as two years of age, ***Neighbourhood Pharmacies supports the approval of this expansion in scope*** as it provides patients with additional points of care for their entire family. We would also ***propose that pharmacists not be restricted only to flu vaccines included in the Universal Influenza Immunization Program***. Coverage through the UIIP should not be

¹ By leveraging over 11,000 points of care with pharmacies conveniently located in every community across Canada, and over 4,500 within the province of Ontario, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

required for pharmacists to provide immunization. Pharmacists should also be able to administer privately procured flu vaccines to individuals who do not qualify for UIIP.

Renew prescriptions in quantities of up to a 12-month supply

As community healthcare providers, pharmacists are readily available and accessible to provide frontline care to their valued patients. In many cases, patients encounter challenges to visiting and being “followed-up” by their physician— particularly given restrictions on primary care and other health services as a result of COVID-19. Expanding scope in a way that allows pharmacists to renew prescriptions up to 12 months will help patients receive healthcare services faster and easier. According to Health Quality Ontario, close to 900,000 Ontarians do not have access to a primary care provider; and less than 40% of Ontarians have same-day or next-day access². Pharmacists have the training and expertise to provide services that bridge these gaps for patients. Pharmacists help ensure continuity of care, and reduce the risk of medication incidents relating to non-adherence due to the unavailability or inaccessibility of other primary care services. ***Neighbourhood Pharmacies supports the approval of the proposed expansion of scope to enable pharmacists to renew prescriptions for up to 12 months.***

As part of implementing this proposal, consideration should be given to ***allowing pharmacists full access to lab reports*** through the Ontario Laboratories Information System (OLIS) or through accelerated access to clinical viewers like ClinicalConnect and ConnectingOntario, to better support pharmacists and pharmacies in serving their patients. This access would assist pharmacists in playing a stronger role in supporting the public health response to COVID-19.

It is equally important to ***enable pharmacists to order laboratory tests*** to equip pharmacists with the necessary tools to have a comprehensive understanding of a patient’s health and medical history in the context of prescription renewals and adaptations. In the interim, as the technical infrastructure of the clinical viewers continues to evolve and grow, ***the use of point of care testing to support pharmacists’ role in medication management is critical and will provide pharmacists with some of the tools required to inform clinical decision making when adapting or renewing chronic medications*** (discussed further below).

Administer certain substances by injection and/or inhalation for purposes that are in addition to patient education and demonstration

Most of our members’ pharmacists have undergone and maintain the required training and qualifications to provide this critical service to patients every year. The same skills and techniques required for the administration of flu vaccines are also required for other routine injections, i.e intramuscular, subcutaneous and intradermal injections. Thus, pharmacists are trained, and pharmacies are equipped to administer substances by injection. Similarly, pharmacists routinely counsel and train patients on the self-administration of various inhaled and injected substances, but are currently not permitted to assist patients with the

² <https://www.hqontario.ca/System-Performance/Primary-Care-Performance>

administration, nor are they permitted to administer these products to patients. Patients requiring products that cannot be self-administered, or who are unable to self-administer, must obtain their prescriptions from their pharmacy and have them administered by their physician – a clear inefficiency and strain on health system resources, and an inconvenience to patients. The ongoing pandemic has made it harder than ever for patients – particularly vulnerable and elderly Ontarians – to visit their physician’s office.

Neighbourhood Pharmacies supports the approval of the proposed changes to enable pharmacists to administer a much broader list of substances, beyond the vaccines currently approved, by injection and inhalation, without limitation to the purposes of education and demonstration. To realize the efficiencies and benefits of pharmacist administering substances by injection or inhalation, consideration should be given to provide pharmacists with prescriptive authority for publicly-funded vaccines as well as other unfunded Schedule I vaccines, such as travel vaccines.

Building on the success of pharmacy participation in the UIIP, ***public funding should be extended to pharmacists for all publicly-funded vaccines***, including routine pediatric vaccinations (per current immunization schedules). Additionally, we believe that pharmacists should be enabled to administer vaccines to Ontarians outside the physical barriers of the pharmacy. This will be particularly critical in the coming flu season, given the anticipated increased demand for the seasonal influenza vaccine and the reduced capacity of healthcare providers across the health system to encourage and support social distancing. In addition to the convenience and systemic efficiencies provided by pharmacy-administered vaccines, ***Neighbourhood Pharmacies believes that enabling pharmacists to administer vaccines and process claims through the OPDP will help improve tracking and reporting of vaccination rates and enable better longitudinal studies evaluating vaccination and downstream hospitalizations, ER visits, and physician visits.***

Finally, we feel it is important to ensure that scope of practice is consistent across all pharmacists, regardless of their place of practice (i.e., community, hospital, or LTC). We therefore propose that in addition to revising the age limit in Part VIII.3 s. 34(4) of the *General Regulation 202/94* of the *Pharmacy Act*, that subsection 34(4)(a) restricting the administration of the flu vaccine to the UIIP, also be revoked.

Enable pharmacists to perform certain point of care tests (POCT) to support their role in medication management and treatment of patients

Since 2012, pharmacy practice has seen a steady expansion in scope, including the ability for pharmacists to prescribe, renew, and adapt prescriptions. Today, pharmacists are considered the primary providers of medication management services. They are routinely consulted by patients and other healthcare providers for advice on medication dosing, effectiveness, and safety. To date, pharmacists have been reliant on various secondary sources of information to support this clinical decision making. While Neighbourhood Pharmacies is committed to continuing to advocate for pharmacy access to OLIS and an accelerated process for clinical viewer access, ***we support enabling the use of point of care tests to enhance pharmacists’ role in medication management. Enabling pharmacists to use point of care tests will provide pharmacists some of the tools***

required to inform clinical decision making when adapting or renewing chronic medications and equips pharmacists to play a more active role in medication management by utilizing tests that measure Hemoglobin A1C, INR, and lipid profiles. Additionally, evidence internationally and results from an ongoing demonstration project in Nova Scotia³ have demonstrated that POCT can significantly improve patient outcomes. Furthermore, POCT has been shown to be a cost-effective alternative to usual care under various reimbursement scenarios.⁴

We propose enabling POCTs to screen for diseases in Ontarians ages 2 and up. Such tests may include but should not be limited to screening for HIV, H.pylori, Hepatitis C, Strep Throat, and COVID-19. Pharmacists are well-positioned to provide convenient and accessible testing that can facilitate early detection of certain conditions. Without question, the negative and positive predictive value of these tests should be carefully evaluated, and pharmacists should be trained on the interpretation of test results.

We also propose that testing not be limited to the physical boundaries of the pharmacy. As a profession that has always practiced the highest standards of hygiene and implemented continuous measures to enhance safeguards in our practice settings, pharmacists are well trained in delivering care safely and hygienically to members of our community. By allowing pharmacists the flexibility to continue to deliver this high standard of care in locations beyond the pharmacy counter and co-located areas, pharmacists will be in an enhanced position to provide greater access and new care pathways for patients in Ontario. Other provinces that have enabled POCT have indicated that “POCTs must only be conducted in an environment that is clean, safe, private and appropriate for collecting the sample, conducting the test, storing the device and supplies, and managing hazardous waste disposal.”⁵ Pharmacists are well trained and well prepared to apply a high degree of hygiene and safeguards if given the opportunity to deliver POCT in any setting – both within the pharmacy’s physical boundaries and outside of them.

Neighbourhood Pharmacies suggests that by providing pharmacists with the above tools to support clinical decision making, it will bring pharmacists practicing in Ontario in line with pharmacy practice in other provinces, and will remove some of the barriers experienced by pharmacists practicing in the community setting that are not experienced in other practice settings. Additionally, it will better position and enable pharmacists in the community to engage in more collaborative practice with other healthcare providers.

Supporting the successful implementation of these proposed changes

While we welcome and support the College's proposed changes, successful implementation is critical to realizing the broad benefits to the public and the healthcare system. Recognition of the importance of remuneration as an enabler is critical. These services are labour-intensive and require significant investment in training, infrastructure, and resources to support their successful implementation. Fair funding for immunization, assessments leading to prescribing activities (i.e., renewals or adaptations) supported by

³ https://pans.ns.ca/sites/default/files/final_evaluation_report_final_-_pans_cpams_eval_2019.09.25.pdf

⁴ https://pans.ns.ca/sites/default/files/cpams_costing_study_final.pdf

⁵ https://abpharmacy.ca/sites/default/files/Standards_Lab_POCT.pdf

Point of Care Testing, and administration of substances by injection or inhalation is critical to the successful implementation and uptake of these services, which in turn is critical to realizing the broader health system benefits these proposed changes have the potential to deliver.

Conclusion

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations that deliver high value, quality care to Canadians in all models, including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative healthcare solutions. We advocate for community-based care through our members' high accessibility and proven track record of providing optimal patient care closer to where patients live, work and play. By leveraging over 11,000 points of care with pharmacies conveniently located in every community across Canada, and over 4,500 within the province of Ontario, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders. We are encouraged by the proposed changes to expand pharmacist scope of practice, and appreciate the government's commitment to working together with pharmacists to improve care quality and end hallway healthcare. We believe that through a collaborative approach that truly engages the critical stakeholders, we can achieve the government's ambitious vision for health system transformation, resulting in health care that is more conveniently accessible, better-integrated, and built around the patient.

Please do not hesitate to contact me at shanna@neighbourhoodpharmacies.ca should you have any questions, comments, or concerns.

Thank you,



Sandra Hanna, RPh.
Chief Executive Officer
Neighbourhood Pharmacy Association of Canada