



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

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August 06, 2020

Patrick Dicerri
Assistant Deputy Minister and Executive Officer, Drugs and Devices
Ministry of Health and Long-Term Care
10, 438 University Avenue
Toronto, ON M7A 1N3

RE: Neighbourhood Pharmacy Association of Canada Submission on Proposed Changes to the LSCCLA

Dear Patrick,

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates this opportunity to respond to proposed amendments to *Regulations 682 and 683* under the *Laboratory and Specimen Collection Centre Licensing Act* (LSCCLA). The amendments to *Regulation 682 (Laboratories)*, if approved, would authorize pharmacy professionals to perform certain point of care tests (POCTs) for the medication management of certain diseases. These tests would include:

- Blood glucose
- Hemoglobin A1C
- Lipids
- Prothrombin time and International Normalized Ratio (INR)

The Ministry is also proposing amendments to *Regulation 683 (Specimen Collection Centres)* that would exempt pharmacists and nurse practitioners from certain requirements of the LSCCLA, and the Regulation, for the purposes of collecting specimens from patients for the purpose of performing POCTs.

These proposed amendments would build on enabling amendments to regulations under the *Pharmacy Act* previously proposed by the College of Pharmacists. Please see the comments provided by Neighbourhood Pharmacies on those proposed changes, along with other proposed scope of practice changes, submitted July 27, 2020.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations, including chain, banner, long-term care, specialty pharmacies, grocery chains, and mass merchandisers with pharmacies. We advocate for pharmacies' role in caring for Canadians, both behind and in front of the counter. We aim to advance sustainable healthcare for all stakeholders by leveraging close to 11,000 pharmacies conveniently located in virtually every community throughout the country – and over 4,500 community locations in Ontario. Pharmacies are integral points of patient care.

As experts in drug therapies and medication management, pharmacists are routinely relied on by patients for advice and care. 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 have emerged as an essential link in our health system and, for millions of Ontarians, the first and most frequent point of contact with their healthcare team.

Proposed regulations

Neighbourhood Pharmacies broadly supports the efforts and progress made by government to create a healthier Ontario and end hallway medicine. We particularly appreciated the 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 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 proposed changes to allow pharmacists (as well as nurse practitioners) to perform certain POCTs will help patients with chronic illness get the care they need more conveniently, from trusted practitioners in their communities.

We believe that these proposed regulatory amendments offer pharmacists an even stronger role supporting the government's response to COVID-19. We urge swift action to enact these changes to ensure that all healthcare providers have the scope and tools they need to quickly, effectively address Ontarians' needs in advance of the upcoming flu season and second wave of COVID-19. Allowing pharmacy professionals to participate in COVID-19 testing, with all the necessary safeguards to protect pharmacists and their patients, is critical to most effectively expanding access to testing across Ontario by leveraging the infrastructure and accessibility of pharmacies in thousands of communities across this province.

Enabling pharmacists to perform certain POCTs

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. Patients and other healthcare providers routinely consult pharmacists for advice on medication dosing, safety and effectiveness. To date, pharmacists have been reliant on various secondary sources of information to support this very important 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 POCTs to support pharmacists' role in medication management. This is a critical step forward and will provide pharmacists with some of the tools required to inform clinical decision-making when adapting or renewing chronic medications.*** This step will also equip pharmacists to play a more active role in medication management by utilizing tests that measure blood glucose, Hemoglobin A1C, INR, and lipid profiles. Additionally, results from an ongoing demonstration project in Nova Scotia¹ have shown that POCTs can significantly improve patient outcomes. Furthermore, point of care testing has been shown to be a cost-effective alternative to usual care under a variety of reimbursement scenarios.²

We propose enabling point of care testing 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, and Strep Throat. COVID-19 screening should also be included (this is explored in more detail below). 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. 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 point of care testing 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.”³ Pharmacists are well trained and well prepared to apply a high degree of hygiene and safeguards if given the opportunity to deliver POCTs in any setting – both within and beyond the pharmacy’s physical boundaries.

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

¹ https://pans.ns.ca/sites/default/files/final_evaluation_report_final_-_pans_cpams_eval_2019.09.25.pdf

² https://pans.ns.ca/sites/default/files/cpams_costing_study_final.pdf

³ https://abpharmacy.ca/sites/default/files/Standards_Lab_POCT.pdf

Supporting the government's response to COVID-19

Consideration of these proposed regulatory amendments offers a significant window of opportunity to introduce changes that support the government's relentless effort to stop the spread of COVID-19. These amendments will make it easier for Ontarians, including those who are potentially asymptomatic carriers of COVID-19, to be tested by trusted health professionals in conveniently accessible pharmacies in their communities. The amendments will also ensure we can quickly respond to outbreaks and manage a possible second wave.

We recommend not only enabling the collection of samples for the purpose of point of care testing but also to support and expand the province's testing capacity through partnerships with the laboratories. The collection of nasal and throat swabs, saliva and/or capillary blood samples can be quickly implemented, while the collection of nasopharyngeal swabs would require changes to the controlled acts in the Regulated Health Professions Act.

The attached letter dated June 20, 2020, from Neighbourhood Pharmacies and the Ontario Pharmacists Association to the Deputy Premier and Minister of Health, Christine Elliott, outlines the regulatory changes required to enable pharmacists to support government's efforts to expand access to COVID-19 testing.

Supporting the successful implementation of these proposed changes

While we welcome and support the 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 crucial. These services are not only labour-intensive but also require significant investment in training, infrastructure, and resources to support their successful implementation. We welcome the opportunity to work with our members and government to ensure COVID-19 testing, in particular, can be implemented in a way that ensures the safety of our patients and front-line providers – this, too, will require an investment of labour, resources, training, and protective equipment. Fair funding for point of care testing and specimen collection to support lab-based testing is vital to successful implementation and uptake, which in turn is critical to realizing the broader health system benefits these proposed changes can deliver.

Conclusion

We are encouraged by the proposed changes to allow pharmacists to conduct POCTs, and appreciate the government's commitment to work with pharmacists to improve care quality and end hallway healthcare. We believe that through a collaborative approach that genuinely engages stakeholders, we can achieve the government's ambitious vision for health system transformation, resulting in healthcare that is more conveniently accessible, better-integrated, and built around the patient. We are also eager to continue to support the government in its response to the ongoing global pandemic.

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

Thank you,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a stylized flourish at the end.

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

- cc. Neeta Sarta, Director, Laboratories and Genetics, Ministry of Health
Angie Wong, Director, Drug Programs Policy and Strategy, Ministry of Health
Allison Henry, Director, Health Workforce Regulatory Oversight Branch, Ministry of Health
Sean Court, Assistant Deputy Minister, Strategic Policy Planning and French Language Services, Ministry of Health
Rana Shamoon, Director, Health Policy, Office of the Premier of Ontario
Laurel Brazille, Director, Stakeholder Relations, Office of the Minister of Health
Leif Malling, Chief of Staff, Office of the Minister of Health
Tina Yuan, Policy Advisory, Office of the Minister of Health
Catherine Pringle, Special Advisor to the Minister, Office of the Minister of Health