



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

**Submission to the Standing Committee on Finance and Economic Affairs
August 26, 2020**



**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

Summary of Recommendations

RECOMMENDATION #1: That government implement support for Essential Services that are making significant additional investments to remain open safely, and to support those faced with increased labour costs or staff recruitment and retention challenges.

RECOMMENDATION #2: Empower pharmacists to expand their scope of practice and leverage their accessibility and expertise, including point of care testing and specimen collection in partnership with laboratories, to expand provincial COVID-19 testing capacity; this should extend to the systematic testing of asymptomatic Ontarians.

RECOMMENDATION #3: Once available, ensure pharmacies are engaged and supported in the distribution and administration of the COVID-19 vaccine.

RECOMMENDATION #4: Expand pharmacy's role in influenza vaccine distribution to include Toronto; harness this infrastructure to efficiently and effectively distribute a future COVID-19 vaccine to communities across Ontario.

RECOMMENDATION #5: Encourage greater availability of seasonal influenza vaccine in pharmacy by bringing Ontario pharmacist administration fees in line with other provinces.

RECOMMENDATION #6: Expand the scope of practice to allow pharmacists to administer more routine vaccines so that patients can continue to access this service throughout the pandemic, and ensure public funding is available for these vaccines when provided through their pharmacies.

RECOMMENDATION #7: Make the investments and enact the proposed changes to scope of practice necessary to enable pharmacists to assess and treat common ailments so that Ontarians can get care conveniently without unnecessary, multiple trips to primary care providers.



1. Introduction

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to comment on the impact of COVID-19 on small and medium businesses in Ontario. Our members – pharmacies across every corner of this province – appreciate the hard work done by this government to support business while protecting Ontarians during this challenging time. Pharmacy is proud to stand hand-in-hand with government and our partners across the health system on the frontlines of the fight against the novel coronavirus. We are eager to continue to work together to bolster this vital sector as we prepare for potential future waves of COVID-19.

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. This fact has particularly emerged during the ongoing pandemic, where pharmacy was designated an Essential Service. Throughout the unfolding 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 central to keeping our economy running through the pandemic.

The pharmacy sector generates about \$3.0 billion in GDP, representing about 6.8 per cent of Ontario's health sector. Ontario pharmacies employ 60,400 people in our province, and the pharmacy services sector indirectly supports another 18,100 jobs. With over 4,500 community pharmacies in Ontario, the sector's total economic footprint – including direct, indirect and induced effects – is estimated at over \$6.2 billion in GDP and 94,000 jobs. As an Essential Service, pharmacy continued to employ tens of thousands of people in neighbourhoods and communities across Ontario throughout the current crisis.¹

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 – which include small, medium and large businesses – are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative health care 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 virtually every community across Canada, and over 4,500 within the province of Ontario, Neighbourhood Pharmacies aims to advance sustainable health care for all stakeholders.

This submission offers recommendations for policies and programs as Ontario recovers and prepares for a possible second wave of infections.

¹ <https://www.conferenceboard.ca/e-library/abstract.aspx?did=9657>

2. Lessons from the First Wave

After months of public health efforts and social distancing measures, Ontarians are relieved to see COVID-19 case numbers trending downward. At the same time, as we reopen our economy, we are cognizant of challenges faced by other jurisdictions that seemingly had the virus beat. It is likely that we will be living with this pandemic for some time to come, making now the right time to urgently prepare for future waves of illness. We have the opportunity to learn from what worked well in the first phase of this pandemic, and what could be done better. We can use these learnings to mitigate further economic disruption while – above all – protecting Ontarians and caring for those who are ill.

In the early days of COVID-19, pharmacy was declared an Essential Service in Ontario. This was borne out on the ground as well as in policy, with pharmacy quickly emerging as Ontarians' preferred choice for a range of healthcare and daily living needs. More than ever before, pharmacies supported their communities through challenging times. Pharmacy and pharmacists also played a vital role in the health system's response to the pandemic. But it has become clear that *more* can be done to leverage the role of trusted, expert pharmacists and conveniently accessible pharmacies.

Pharmacies are uniquely positioned as both vital links in the health care chain and important businesses, helping drive Ontario's economy. Our members stepped up not only as care providers but as businesses, investing significant resources to ensure their vital services could continue to be offered in a way that ensured safety of their patients, customers, and workers alike. Because of restricted access to other health providers, pharmacists dealt with an unprecedented volume of interactions with members of the public. Pharmacies incurred major costs to keep their doors open. And yet they have done so with limited financial support from government, in many cases falling through the cracks of federal and provincial programs that have helped numerous other businesses.

Ontarians voted with their feet: with social distancing measures in place, pharmacy became the place where Ontarians felt safe accessing vital medical supplies, and receiving expert advice and care. There is a clear opportunity for government to leverage this reality to make pharmacy central to COVID-19 planning and preparation, offering enhanced services to support Ontarians through future waves of the pandemic, and ensuring these important businesses can continue to thrive at the heart of their communities.

3. Keeping Ontarians Safe

Measures to protect Ontarians

With pharmacies designated an Essential Service, our members have stayed open to care for patients, despite being at high risk of infection as immediate frontline health care providers. To remain open, pharmacies have adopted numerous measures to minimize risk to staff and the public, including:

- Limiting the number of people inside stores because public health has established directives to restrict the flow of people;
- Installing physical barriers (including Plexiglas shields at counters), signage, sanitizing stations and other measures;
- Purchasing personal protective equipment for staff;
- Increasing routine cleaning and sanitization of stores and the dispensary;
- Increasing medication deliveries, allowing patients and customers to remain in quarantine and self-isolation;

- Instituting "hero pay" policies to retain and support frontline staff;
- Hiring additional staff when employees become ill or have to self-isolate;
- Managing higher workload and call volumes, with reduced store hours.

Our members responded quickly at the beginning of the pandemic to meet public health guidelines and make their spaces safe for customers and staff. **One-time costs of approximately \$7.1 million** were incurred in March alone to erect physical barriers, deploy physical distancing guides and sanitization, and invest in technology to enable virtual care. Neighbourhood Pharmacies estimates our members then collectively incurred **\$29.9 million per week** in additional costs to remain open and serve their communities through the first wave of COVID-19.

In the first thirteen weeks of the pandemic, Ontario pharmacies incurred almost \$400 million in costs.²

Without clear indications of when the pandemic will cease, many of these measures and costs will extend well into the future. Like other health care providers, pharmacies need to be supported as we work toward the same goals: serving patients, protecting the pharmaceutical supply chain to ensure all Ontarians have access to the medicines they need, and creating capacity in our province as we prepare for future waves.

Business supports

Neighbourhood Pharmacies appreciates the action Ontario has taken to support business, including affordable hydro bills for small businesses, rent assistance and eviction protection, interest and penalty relief for some provincially-administered taxes, and employer health tax relief. The federal government has also offered necessary support, including the Canada Emergency Wage Subsidy (CEWS).

However, in too many cases, pharmacy has not benefitted from programs intended to help businesses impacted by COVID-19. Federally, for example, the revenue threshold for CEWS eligibility does not take into account the increased costs borne by pharmacies to remain open and minimize risk for staff and the public, noted above. Pharmacies need to be supported as they serve patients, protect the pharmaceutical supply chain so Ontarians have access to vital medicines they need, and create health system capacity.

In the early stages of the pandemic, federal and provincial supports rightly focused on preventing job losses and business closures – enabling employers to retain and rehire workers and preventing them from being evicted due to declining revenues. As the economy reopens, it is sensible for government to recognize and support these vital businesses that are incurring high costs to keep their doors open safely. Specifically, pharmacy must remain a viable sector, not just because of its economic impact on communities, but also because of its central role in healthcare and pandemic management and response.

RECOMMENDATION #1: That government implement support for Essential Services that are making significant additional investments to remain open safely, and to support those faced with increased labour costs or staff recruitment and retention challenges.

² This and figures above based on 4,566 pharmacies. NAPRA national statistics as of Jan 1, 2020.

4. Preparing for the Next Wave

As we continue to safely reopen the economy and begin to cast our gaze toward the future course of this pandemic, Ontario pharmacies stand shoulder-to-shoulder with government in our shared commitment to avoid a resurgence of COVID-19. Now more than ever, people in every corner of this province have come to rely on the care and services they receive in pharmacy. We strongly believe more can be done to empower pharmacies and pharmacists to protect the communities they serve.

Pharmacy professionals do more than dispense prescriptions – they are integral players in primary care and public and population health. With more than 4,500 points of care in communities from the remote north to the heart of downtown Toronto, pharmacies are uniquely positioned to expand capacity and mitigate the strains placed on the health care system as we prepare for future waves of this virus. Enabling pharmacists to deliver further assistance can help keep patients out of hospital and alleviate pressures on other health care resources, including family physicians and telehealth, reducing hallway medicine, and keeping people safe. An essential first step will be ensuring pharmacy remains a viable and vibrant business in Ontario.

Testing Capacity

Widespread testing will be vital to ensure Ontario's economy and schools can remain safely open. Community pharmacies are the health system's most convenient touchpoint for millions of Ontarians. We believe that capacity and accessibility can be harnessed to increase testing capacity as we move toward recovery. As government increases testing capacity and considers future serological testing, we are eager to discuss how pharmacy can help. Pharmacists in the United States and Alberta are now administering tests, and other provinces are investigating similar opportunities. This discussion should include the testing of asymptomatic Ontarians, to reduce the risk of outbreaks and the spread of COVID-19.

Government is currently considering proposed regulatory changes to allow pharmacists to perform certain point of care tests. This regulatory change should be extended to support and expand COVID-19 testing capacity through partnerships with laboratories. Collection of nasal and throat swabs, saliva, and/or capillary blood samples can be quickly implemented, and collection of nasopharyngeal swabs would require legislative amendment of the *Regulated Health Professions Act*. Pharmacists should be fairly compensated to recognize the labour, training, infrastructure, and resources invested to undertake this vital testing. We urge swift action to enact these changes, so all health providers have the scope and tools they need in advance of a second wave of COVID-19.

RECOMMENDATION #2: Empower pharmacists to expand their scope of practice and leverage their accessibility and expertise, including point of care testing and specimen collection in partnership with laboratories, to expand provincial COVID-19 testing capacity; this should extend to the systematic testing of asymptomatic Ontarians.

COVID-19 Vaccine

We know that the availability of a COVID-19 vaccine will be crucial to ending the ongoing pandemic. Pharmacists are already significant and direct contributors to vaccine-related public health programs for influenza and infectious disease. For many Ontarians, local pharmacies are the preferred venue for receiving a range of common vaccines: 34% percent of Canadians receive their flu shot at their pharmacy (exceeding the 30% receiving the shot at their physician's office) with nearly 1.4 million doses administered through Ontario pharmacies in 2019-20. Pharmacists' accessibility and

longitudinal relationships with patients allow them to provide education and awareness, increase vaccination rates, and support adherence through multiple touchpoints over patients' life span.

We have seen significant success with pharmacist-administered influenza programs and know that pharmacists can further support public health initiatives with other vaccines. Additionally, we have seen significant improvements in efficiency and significant reductions in waste when pharmaceutical supply chains are leveraged for the distribution of vaccines. When a COVID-19 vaccine is available, public health and primary care capacity will be challenged to provide widespread immunization. Community pharmacy is poised to help.

RECOMMENDATION #3: Once available, ensure pharmacies are engaged and supported in the distribution and administration of the COVID-19 vaccine.

Pharmacies already have data systems recording all claims processed in the pharmacy. Currently, all drug claims are captured through these systems. Should claims for vaccines and testing be processed through these systems, this data would be easily captured in the same manner and would be readily available to government. This digital infrastructure could be leveraged to track testing, test results, and vaccination records, which would be of great value as Ontario makes its way through the COVID-19 recovery phase. This vital step will further integrate pharmacy's digital infrastructure with the primary care and public health network, creating stronger, more accurate community resources for patients and healthcare providers.

COVID-19 vaccine administration through community pharmacy offers a valuable opportunity to collect, integrate, analyze, and mobilize data through provincial drug program claims. Pharmacies are also well positioned to provide information on the number of vaccines per region to identify immunization rates and behaviour patterns. This information can be integrated with other provincial public health data to contribute to improved analysis and modelling.

Flu Season

Similarly, we anticipate greater demand for seasonal influenza vaccination in the 2020-21 season. 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, and that all providers will be challenged to meet the increased demand due to public health requirements around social distancing. Pharmacy has a critical role to play in creating capacity in Ontarians' communities protecting people from flu.

Government's planning for the fall should include expanding the use of pharmacy's robust supply chain for distributing influenza vaccines to include Toronto, in addition to the remainder of the province which already benefits from pharmacy's distribution infrastructure. This approach will further improve vaccine distribution efficiency and create capacity in public health. By alleviating strains to the health care system, public health units can continue doing what they have done so well: prioritizing patients and ensuring vulnerable populations receive care. It's vital for government to ensure the right distribution infrastructure is in place to quickly deploy a new COVID-19 vaccine to communities across the province.

RECOMMENDATION #4: Expand pharmacy’s role in influenza vaccine distribution to include Toronto; harness this infrastructure to efficiently and effectively distribute a future COVID-19 vaccine to communities across Ontario.

It is always important that we protect the most vulnerable Ontarians from seasonal influenza; this is especially the case when people face the double threat of influenza and COVID-19. However, the ongoing pandemic imposes additional investments in personal protective equipment and other material to keep staff and patients safe while administering the seasonal influenza vaccine. With this in mind, in order to ensure as many pharmacies as possible have the resources to offer flu vaccine this year, Ontario should bring its administration fees in line with other Canadian provinces to help support pharmacies with the additional costs of delivering the service. We propose a \$3.00 increase, from \$7.50 to \$10.50; this change would remain below the national median. This change will allow the program to sustainably continue on a cost-recovery basis.

Increasing availability of the seasonal influenza vaccine in pharmacy will drive overall cost savings, as related administration costs would offer greater efficiencies than physician administration. More importantly, it will further increase the ease of access to flu vaccines for millions of Ontarians when other parts of the health system may be overloaded.

RECOMMENDATION #5: Encourage greater availability of seasonal influenza vaccine in pharmacy by bringing Ontario pharmacist administration fees in line with other provinces.

Other Routine Immunizations

With physician offices closed or offering reduced services throughout the pandemic, there has been a backlog in provision of a number of care services – including routine immunizations. Across Ontario, children’s vaccination schedules have been delayed as a result of COVID-19. Pharmacy can fill the gap.

Pharmacists already administer the influenza vaccine to Ontarians older than 2 years of age and are authorized to offer a number of non-publicly-funded vaccines. Pharmacists can and should play a significant role in providing publicly-funded vaccines; they have the necessary training and expertise to deliver these services. The success of seasonal flu vaccination through pharmacy demonstrates that Ontarians appreciate the convenience of getting vaccines from their trusted community pharmacist. Unlike many primary care providers, pharmacy remained open throughout the first wave of COVID-19. This opportunity will create capacity in primary care and address patient needs through the pandemic.

RECOMMENDATION #6: Expand the scope of practice to allow pharmacists to administer more routine vaccines so that patients can continue to access this service throughout the pandemic, and ensure public funding is available for these vaccines when provided through their pharmacies.

Minor Ailments

In addition to creating capacity in public health, pharmacy can help to alleviate the pressure on primary care as Ontario continues to grapple with COVID-19. Specifically, expanding scope of practice to allow pharmacists to assess and treat common ailments like insect bites, sprains and strains, allergies, and cold sores, among others, will allow Ontarians to conveniently receive treatment and care in pharmacy for these conditions.

This scope expansion would eliminate the need for patients to travel to their family physician's office or a clinic for diagnosis and prescription, followed by a trip to their pharmacy to receive medication. In the midst of a global pandemic, this scope expansion for pharmacists will help reduce Ontarians' exposure to COVID-19 in primary care settings by eliminating patients' travelling to multiple sites to receive care.

The Ontario College of Pharmacists has recently considered and submitted to government potential scope changes at the request of the Minister of Health. We urge government to quickly move forward with these proposed changes and make the necessary investments to ensure pharmacists are fairly compensated for these services.

By leveraging the full extent of pharmacists' expertise, we will increase capacity in primary care, improve access and convenience for Ontarians, drive health system efficiencies, and offer better care and protection for patients.

RECOMMENDATION #7: Make the investments and enact the proposed changes to scope of practice necessary to enable pharmacists to assess and treat common ailments so that Ontarians can get care conveniently without unnecessary, multiple trips to primary care providers.

5. Conclusion

The current consultation is focused on the experience of small and medium businesses in Ontario through COVID-19, and potential further steps that government can take to ensure the province's economy successfully recovers. We know that our economy's performance is fundamentally linked to the course of the unfolding pandemic in our corner of the globe. Pharmacy stands at the crossroads as a vital and vibrant business sector that is also on the frontline of the battle against the novel coronavirus. Our recommendations, then, encompass both business and public health insights: the right actions are needed in both areas to protect our population and grow our economy.

But while the conversation, here and more broadly, is focused on our response to the pandemic, there is a considerable opportunity for Ontario's government to implement changes that will benefit people for generations, when COVID-19 is a receding memory.

We can learn from the gaps in our health system that this crisis has exposed, and from the many swift, decisive actions we have taken in response. Together, we can build a future where, when a person is sick, they can access a variety of common diagnostic tests at their local pharmacy, without waiting for a doctor's appointment or going to the emergency room. Ontarians with mild illness and minor ailments could get an examination, diagnosis, and prescription at the pharmacy down the street – and return home with the treatment that will make them better. They can conveniently and safely access needed vaccines to protect them against seasonal influenza. And this will all reduce the pressure placed on our family doctors and hospital emergency departments.

We are encouraged by many of the actions the government has taken to date, and we are pleased to bring these further suggestions before the Standing Committee on Finance and Economic Affairs for consideration. We believe that with a collaborative approach that engages critical stakeholders and empowers health providers, we can best protect Ontarians from COVID-19, fight this illness, and build the foundation for long-term improvements in our health system.

About the Neighbourhood Pharmacy Association of Canada

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 health care 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 located in virtually every community across Canada, we aim to advance sustainable health care for all stakeholders.