



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**



ONTARIO
**PHARMACISTS
ASSOCIATION**

October 7, 2020

Patrick Dicerri
Assistant Deputy Minister and Executive Officer
Drugs and Devices, Ministry of Health
438 University Avenue, 10th Floor
Toronto, ON M7A 1N3

RE: Rapid COVID-19 Testing

Dear Patrick,

As the Ontario Government takes the next steps to prepare for the deployment of COVID-19 rapid molecular-based point of care tests, pharmacies are being increasingly recognized as an ideal access point to expand on the current testing strategy. By leveraging the pharmacies throughout the province we can help build testing capacity and reduce the dependency on the laboratory system. We believe that pharmacies are uniquely positioned to support the administration of the recently Health Canada approved ID ONE rapid test for asymptomatic patients.

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) and the Ontario Pharmacists Association represent Ontario's pharmacists and pharmacies including chain, banner, long-term care, specialty pharmacies, grocery chains, independents and mass merchandisers. Collectively, we aim to advance healthcare for Ontarians by leveraging close to 4,600 pharmacies conveniently located in virtually every community as integral points of patient care and over 20,000 pharmacy professionals.

Detecting, testing and responding to infectious disease is a primary tenet of public health. Community pharmacies can assist public health efforts in this area and specifically as part of the COVID-19 response. We believe that we can be an integral part of the solution to support extensive testing in the community.

Maintaining high standards for safety and quality is critical, and we support Canada's regulators in their review of new, more sophisticated tests. Of equal importance is the need to minimize the potential for improper use of tests or specimen collection, the risk of misinterpreting results and addressing concerns around the lack of access to professional counsel. As rapid, point of care tests are approved and become available, pharmacists are well-positioned to safely and effectively administer and/or distribute new test modalities while ensuring the appropriate use of the tests, the review of results with the patient and the consultation on recommendations for self-care based on results and public health guidelines.

Further, pharmacies already have data systems that capture all claims processed in the pharmacy in real time. Currently, all public drug claims are captured through these systems. Should claims

for vaccines and testing be processed through these systems – as is done for the influenza vaccine – the data would be easily captured in the same manner and would be readily available to the Ministry of Health. The data can in turn be shared with the federal government. Pharmacy’s digital infrastructure ought to be strategically leveraged to support the deployment of point of care testing 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 also represents a first step in the further integration of this digital infrastructure with primary care, tertiary care and public health networks to leverage these important community resources.

We welcome the opportunity to further discuss opportunities for pharmacies and pharmacy professionals to support mass testing, support data collection and tracking efforts as Canada moves toward greater adoption of point of care tests.

Regards,



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