



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
de quartier**

**Office of the Chief Executive Officer**

365 Bloor Street East, Suite 2003  
Toronto, ON M4W 3L4  
T : 416.226.9100  
F : 416.226.9185  
info@neighbourhoodpharmacies.ca  
[neighbourhoodpharmacies.ca](http://neighbourhoodpharmacies.ca)

December 5, 2020

Ministry of Health  
5700 Yonge St, 3<sup>rd</sup> Floor  
Toronto, ON  
M2M 4K5

**RE: Neighbourhood Pharmacy Association of Canada Submission on Proposed Changes to Recordkeeping Requirements Under the Ontario Drug Benefit Program**

To whom it may concern,

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates this opportunity to respond to proposed amendments to Regulation 201/96 under the Ontario Drug Benefit Act (ODBA).

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.

**Proposed Amendments**

The amendments, if approved, would streamline recordkeeping requirements by reducing specific records referenced in the regulation that pharmacists are required to retain, replacing them with a general requirement for pharmacists to follow requirements laid out in the Ontario Drug Programs Reference Manual (Manual).

Replacing specific document references with a general reference to the Manual would reduce the possibility of conflict and confusion should the retention requirements outlined in the Manual differ from those stipulated in Regulation. It would also provide government with greater flexibility to update retention requirements by allowing changes to the Manual to reflect program and policy changes without the need to amend the corresponding Regulation. This builds on previous amendments to the ODBA and Regulation that allow reference to the Manual to be incorporated into Regulation. This would also allow most recordkeeping requirements and retention periods to be set out in the Manual, offering a single, streamlined document for pharmacies and dispensing pharmacists to rely on.

## **Ensuring Successful Implementation**

By aligning Regulatory requirements with ongoing changes to policy and programs, collecting more information into a single document, and giving government greater flexibility to update rules around recordkeeping, pharmacies and pharmacists will benefit from greater clarity and streamlined, up-to-date requirements.

Neighbourhood Pharmacies supports this effort to simplify recordkeeping requirements and add clarity to pharmacy operations. Our members are in favour of any changes that reduce the risk of confusion related to pharmacies' and pharmacists' responsibilities and obligations, as well as any regulatory burden reduction that will allow pharmacists to spend less time managing paperwork and more time caring for their patients.

However, while we appreciate the need for greater flexibility, changes to recordkeeping requirements can require significant modifications to pharmacy policies and processes. Clear communication between the Ministry and pharmacy is vital to ensuring changes are successfully rolled out.

As such, we recommend that the Ministry **ensure a transparent and consistent process that provides pharmacies with reasonable advance notice and a clear explanation of changes to recordkeeping requirements**, so that pharmacies have adequate time to make changes to their internal recordkeeping policies and processes to maintain compliance.

For the government to achieve its goal of reflecting up-to-date recordkeeping requirements in the Manual, we also recommend that the **Ministry update the Manual to reflect current requirements under the existing Regulation**. Currently the Manual does not reference recordkeeping requirements and retention periods under Regulation 201/96 related to no substitution prescriptions, extemporaneous preparations, and actual acquisition cost claims. Should the proposed amendments be approved and these specific requirements are removed from the Regulation, government must ensure the Manual is updated accordingly.

## **Conclusion**

We are encouraged by the proposed changes to recordkeeping requirements. By addressing the concerns noted above, pharmacy and pharmacists will benefit from clearer and more streamlined requirements. Please do not hesitate to contact me at [shanna@neighbourhoodpharmacies.ca](mailto:shanna@neighbourhoodpharmacies.ca) should you have any questions, comments, or concerns.

Thank you,



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