



Neighbourhood  
Pharmacy  
Association of Canada

Association canadienne  
des pharmaciens  
de quartier



ONTARIO  
PHARMACISTS  
ASSOCIATION

December 21, 2020

The Honourable Christine Elliott  
Deputy Premier and Minister of Health  
777 Bay St., 5<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Dear Deputy Premier,

We are writing to you today on behalf of 20,000 pharmacy professionals across over 4,600 pharmacies in Ontario to offer the full support of Ontario's Pharmacists in the community rollout of the COVID-19 vaccine.

This will be the largest and most complex vaccination campaign in history and will require that all healthcare professionals to work together to ensure its success. **Our Pharmacists and pharmacies have the capacity to vaccinate close to 1 million patients a week without impacting regular dispensing and medication management services.** With convenient access and, in many cases, extended hours beyond other primary care providers in the community, the community pharmacy sector is committed and ready to serve Ontarians in urban, suburban, rural, remote, and isolated communities. Following the prioritization parameters as set out by the province, community pharmacy can play a vital to supporting effective and efficient COVID-19 vaccination at all stages of deployment.

**Ontarians want and expect to get vaccinated at their community pharmacy.** Ontarians recognize the essential role that Pharmacists will play in delivering COVID-19 vaccines. According to a recent survey conducted by the Canadian Pharmacists Association and Abacus data<sup>1</sup>:

- 58 per cent of Ontarians say they would get a COVID-19 vaccine at a pharmacy, and
- Nearly 80 per cent trust that their Pharmacist is knowledgeable about vaccines, can safely administer vaccines and that pharmacies are a safe place to receive their vaccines

**Pharmacists are one of the most trusted health care providers and the first and most frequent touchpoint the majority of Ontarians have with the health care system<sup>ii,iii</sup>.** In addition to administration, Pharmacists' can play a critical role in instilling confidence and increase rates of adherence through repeated engagement with Ontarians on vaccine hesitancy<sup>iv</sup>. Once the highest priority Ontarians are immunized and more vaccines with broader stability ranges are approved, pharmacies and pharmacists will have an additional role as integral immunizers to reach herd immunity<sup>v</sup>. Pharmacy has experience in medication adverse event management and reporting. Pharmacists are also ideally positioned to monitor the safety of vaccines and address adverse reactions in patients.

**Pharmacists can increase immunization rates and adherence to multi-dose vaccines, which will be critical to reaching herd immunity.** Pharmacists have established experience in administering multi-dose regimens and have been shown to increase immunization and adherence rates for shingles, HPV and hepatitis vaccines<sup>vi,vii</sup>.

Many of these vaccines will require anywhere from one to three doses delivered in a strictly adhered-to regimen. Community pharmacists regularly track, monitor, and communicate with patients via the refill interval functions in their pharmacy management systems. Additionally, most pharmacies have invested in appointment booking procedures to remind patients of the need to return for a refill<sup>viii</sup>. In fact, pharmacies have established experience in administering multiple vaccines opportunistically which is supported by NACI guidance<sup>ix</sup>.

**Pharmacies have the systems in place to support patient prioritization and access.** Doses of vaccine will need to be allocated based on priority populations identified through NACI recommendations and established in provincial frameworks. Pharmacies can proactively identify priority populations and through the existing pharmacy claims processes, real-time data will be available to track and measure immunization rates. Pharmacists are highly accessible healthcare providers operating in urban, rural and remote including indigenous communities. Pharmacists can administer the COVID-19 vaccination in environments outside of the community pharmacy, including (but not limited to) long-term home care homes, regulated senior conjugate living facilities, group homes, workplaces and other settings.

**Pharmacies can contribute significant capacity to this vaccination campaign.** Pharmacies have already invested in the infrastructure and procedures necessary to administer vaccines safely during the COVID-19 pandemic, including: PPE protocols and training, disinfection and cleaning procedures, screening procedures to identify COVID-19 symptoms, appointment booking procedures, and appropriate spacing within pharmacies to ensure safe distancing for patients and staff<sup>x</sup>. Pharmacies are supported by extra capacity of the approximately 1500 pharmacy students on their teams as part of experiential placements from the Leslie Dan Faculty of Pharmacy (University of Toronto) and School of Pharmacy (University of Waterloo).

**Pharmacies can manage storage and handling requirements.** Pharmacists and pharmacies are also able to manage complex storage for cold chain specifications and handling requirements for medications and vaccines.

**Pharmacies have the infrastructure to collect data that will be critical to the success of a large scale COVID-19 vaccination program.** Key information on every patient who receives a vaccine in a pharmacy is captured digitally and automatically transmitted to provincial drug programs through claims submissions. This includes the name of the vaccine, the date, and important patient identifiers, such as the health card number using our secure patient management IT systems. Provinces that have a vaccine registry already in place could upload this data automatically rather than creating new data systems. Such information will be essential when evaluating the effectiveness of each vaccine and the success of the COVID-19 campaign.

## **Our Recommendations**

### **1. Regulatory Changes to O. Reg. 202/94 of the *Pharmacy Act, 1991*.**

Pharmacists currently are only enabled to administer vaccines listed in Schedule III or influenza vaccine in accordance with Ontario's Universal Influenza Immunization Program. We propose a change in regulation to add the COVID-19 vaccine to Schedule III. Currently all vaccines on this list are administered and paid for privately by patients and pharmacists do not have access to publicly funded vaccines for any of those on this list.

2. **Leverage the existing robust pharmaceutical distribution system to distribute the COVID-19 vaccine.** Ontario pharmacies are already served by a sophisticated and highly reliable pharmaceutical distribution system that allow pharmacists to act as both health care and system providers, leading to significant reductions in waste and improved efficiency.

We suggest using a modified and less-restrictive version of the Universal Influenza Immunization Program (UIIP) system to distribute COVID-19 vaccines. Building off what already exists, this will prioritize efficient and timely vaccinations while reducing red tape across the distribution process, such as in applications to participate, inspection of pharmacies by public health, among others.

3. **Enable Ontario pharmacies to operate at the scale required.** Prioritize Pharmacists and their teams to receive the COVID-19 vaccine. With appropriate government support, distribution planning and supply of vaccine, Ontario pharmacies will have the capacity to administer close to 1 million doses per week.
4. **Reasonable reimbursement of \$13.50 per dose.** This fee incorporates complexity and costs to deliver the program in addition to education on vaccine hesitancy, patient prioritization and triage, patient screening, follow-up and scheduling to ensure adherence to multi-dose vaccine regimen, post vaccine and adverse event monitoring and reporting.

We would appreciate the opportunity to meet with you at your earliest convenience to discuss how Ontario's Pharmacists and pharmacies can support the Ontario government as you work on a COVID-19 vaccine distribution plan and how it fits into a broader vaccine strategy. We look forward to continuing our strong collaboration to protect all Ontarians.

Sincerely,



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Chief Executive Officer  
Neighbourhood Pharmacy Association of Canada



Justin Bates  
Chief Executive Officer  
Ontario Pharmacists Association

cc Heather Watt, Chief of Staff to the Deputy Premier and Minister of Health  
Laurel Brazill, Director, Stakeholder Relations, Office of the Deputy Premier and Minister of Health  
Mark Lawson, Chief of Staff, Office of the Premier of Ontario  
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Sylvia Jones, Solicitor General  
General (ret'd) Rick Hillier, Chair, COVID-19 Vaccine Distribution Task Force  
Helen Angus, Deputy Minister of Health

Ken Chan, Assistant Deputy Minister, COVID-19 Vaccine Distribution Secretariat,  
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Patrick Dicerni, Assistant Deputy Minister and Executive Officer, Drugs and Devices,  
Ministry of Health  
Sean Court, Assistant Deputy Minister, Strategic Policy, Planning and French Language  
Services, Minister of Health

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<sup>i</sup> Canadian Pharmacists Association, Abacus Data. (2020). Pharmacists and COVID-19 Vaccinations in Canada. *Survey*. Retrieved December 8, 2020 from: [https://www.pharmacists.ca/cpha-ca/function/utilities/pdf-server.cfm?thefile=/cpha-on-the-issues/CPhA\\_COVID\\_Vaccine\\_Report-Nov2020.pdf](https://www.pharmacists.ca/cpha-ca/function/utilities/pdf-server.cfm?thefile=/cpha-on-the-issues/CPhA_COVID_Vaccine_Report-Nov2020.pdf)

<sup>ii</sup> Manolakis, P. G., & Skelton, J. B. (2010). Pharmacists' contributions to primary care in the United States collaborating to address unmet patient care needs: the emerging role for pharmacists to address the shortage of primary care providers. *American journal of pharmaceutical education*, 74(10), S7.

<sup>iii</sup> Tsuyuki, R. T., Beahm, N. P., Okada, H., & Al Hamarneh, Y. N. (2018). Pharmacists as accessible primary health care providers: Review of the evidence. *Canadian Pharmacists Journal*, 151(1), 4–5.

<sup>iv</sup> Bragazzi, N.L. (2019). Pharmacists as Immunizers: The Role of Pharmacies in Promoting Immunization Campaigns and Counteracting Vaccine Hesitancy. *Pharmacy: Journal of Pharmacy Education and Practice*, 7.

<sup>v</sup> Lee L, Peterson GM, Naunton M, Jackson S, Bushell M. (2020). Protecting the Herd: Why Pharmacists Matter in Mass Vaccination. *Pharmacy*, 8(4), 199.

<sup>vi</sup> Houle SKD, Eurich DT. (2019). Completion of multiple-dose travel vaccine series and the availability of pharmacist immunizers: A retrospective analysis of administrative data in Alberta, Canada. *PLoS One*, 14(1), e0211006.

<sup>vii</sup> Doucette, Kent, Seegmiller, McDonough, & Evans. (2019). Feasibility of a Coordinated Human Papillomavirus (HPV) Vaccination Program between a Medical Clinic and a Community Pharmacy. *Pharmacy*, 7(3), 91.

<sup>viii</sup> Neighbourhood Pharmacies Association of Canada. (2020). COVID-19 Vaccine Readiness Survey (December, 2020). *NPAC Survey Results*. Retrieved December 2020 from: data on file.

<sup>ix</sup> National Advisory Committee on Immunization. Guidance on the use of influenza vaccine in the presence of COVID-19. *Vaccines and Immunizations*. Retrieved December 8, 2020 from: <https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci/guidance-use-influenza-vaccine-covid-19.html>

<sup>x</sup> Canadian Pharmacists Association. (2020). Protecting the Front Line: Day to Day COVID-19 Questions. *COVID-19 Information for Pharmacists*. Retrieved December 8, 2020 from <https://www.pharmacists.ca/advocacy/covid-19-information-for-pharmacists/guidelines-for-protecting-the-front-line-covid-19-day-to-day-questions/>