



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**



**ONTARIO
PHARMACISTS
ASSOCIATION**

Advocating Excellence
in Practice and Care

June 5, 2020

The Honourable Doug Ford
Premier of Ontario
Legislative Building, Queen's Park
Toronto, ON M7A 1A1

The Honourable Christine Elliott
Deputy Premier and Minister of Health
5th Floor, 777 Bay Street
Toronto, ON M7A 2J3

Dear Premier Ford and Deputy Premier Elliott,

On behalf of the Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies), Ontario Pharmacists Association (OPA) and our respective members, we would like to thank you for your government's proactive response to the ongoing COVID-19 pandemic. We appreciate your quick action to protect and support frontline healthcare workers and prevent the spread of this virus.

As the organizations representing pharmacies and pharmacy professionals in Ontario we are also encouraged by your comments on Wednesday, June 3 that indicate your desire to work with pharmacies to expand access to testing in Ontario.

As you continue along your pathway toward reopening the economy, Ontario pharmacy professionals stand shoulder-to-shoulder with your 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 and trust the care and services they receive in community pharmacy. Pharmacy professionals do much more than just dispensing prescriptions – they are integral players in primary care and in public and population health as they have demonstrated with their hugely successful role in the administration of flu shots. We strongly believe more can be done to empower pharmacists within their communities, and so we are writing you today to share three priority areas in which OPA and Neighbourhood Pharmacies can partner with the government of Ontario to support a safe and measured reopening of our economy. Our three recommendations are centred on a plan to implement rapid and secure testing, ensure that the province is prepared for the upcoming flu season and enable the quick deployment of a province-wide vaccine program when a vaccine is developed. Within our respective memberships, there is support to pursue these initiatives.

We want to work with your government, and other stakeholders, to responsibly plan for the upcoming flu season and the impending COVID-19 vaccine. If we plan now, by preparing regulations in a package that includes the high dose flu and COVID-19 vaccine, it will save time and unnecessary or rushed emergency measures later.

Recommendation 1: Engage Ontario's 4,600 Community Pharmacies in COVID-19 Testing

We applaud the leadership of the Ontario government and your recognition of pharmacy professionals as vital and essential members of the healthcare team in this emergency response effort. We also thank you for acknowledging the central role of Ontario's pharmacies in providing front line services. We know that widespread testing will be vital to ensure the successful reopening of Ontario's economy while the pandemic runs its course. Ontario's 4,600 community pharmacies are the health system's most accessible touchpoint for millions of Ontarians and present an unparalleled opportunity for your government to harness the capacity and accessibility they can deliver to increase testing capacity as we collectively move toward the recovery phase. We are eager to discuss and outline how pharmacy can help support your testing strategy – both for PCR and serology testing.

Recognizing the need for immediate testing to support reopening the economy, OPA and Neighbourhood Pharmacies propose a two-phased approach:

- **In Phase 1**, we propose a voluntary, opt-in model whereby pharmacies that are able to meet the minimum set of requirements/infrastructure (i.e., parking lot) and with access to appropriate PPE to ensure the safety of staff and the public, are enabled and leveraged to support the government's testing strategy by expanding access to COVID-19 testing.
 - To enable pharmacy's participation in testing, modification and passage of changes to O.Reg. 202/94 of the *Pharmacy Act, 1991* that support expansion of scope of practice in the area of point-of-care testing (POCT) regulations would need to be expedited to enable pharmacy professionals to administer POCT for the purpose of disease management and diagnosis. In addition, the government will need to fast-track the drafting of amendments to the *Laboratory and Specimen Collection Centre Licensing Act, 1990* such that pharmacies can be designated as specimen collection centres for COVID-19 testing as well as any other types of POCT for chronic disease and medication management and monitoring. From a remuneration perspective, this phase could be operationalized on a fee-for-service basis, considering material (including but not limited to PPE) and labour costs associated with providing the tests.
- **With Phase 2**, as new POCT technologies emerge and receive Health Canada approval, serological testing could be offered by community pharmacies:
 - If POCTs are approved by Health Canada for self-administration by members of the public (as they are in some other jurisdictions across the globe), pharmacies can play a critical role to distribute these tests and make them readily available to Ontarians. If POCTs have not been approved for self-administration, pharmacies are a natural partner to administer these tests.
 - Additionally, we know that the interpretation of and educational support for these test results remain critical, and pharmacists are ideally positioned to provide this service to Ontarians.
 - Regulations enabling pharmacists to administer POCTs were reviewed and submitted following the Ontario College of Pharmacists' consultation on scope expansion in fall 2019. This scope expansion received overall support (primarily for the purpose of disease management), but the regulations were never enacted by government. By extending the purpose of this scope expansion to include serological POCT for COVID-19 and expediting regulatory passage of changes to O.Reg. 202/94 under the *Pharmacy Act, 1991* as well as to R.R.O. 1990, Reg. 682 and Reg. 683 under the

- Laboratory and Specimen Collection Centre Licensing Act, 1990*, pharmacists can immediately support the province's serological testing strategy.
- Most critically, we note that through the Health Network System, all pharmacies are directly linked to the ministry, whereby all COVID-19 testing transactions with positive and negative results can be captured through this system in real-time. This provides an unparalleled opportunity for pharmacies to support the recovery by contributing real-time data on testing rates and aggregate results.
 - For this intermediate phase, these activities could be quickly enabled through a directive from the Chief Medical Officer of Health under the *Emergency Management and Civil Protection Act, 1990*. However, a more permanent solution would be needed, and we would therefore urge a simultaneous and expedited consultation posting to the regulatory registry for amendments to Regulations 682 and 683 under the *Laboratory and Specimen Collection Centre Licensing Act, 1990*. Included in this regulatory consultation would be proposed amendments to provide pharmacists with the authority to receive and order laboratory test results via the Ontario Laboratory Information System (OLIS). This has been a long-sought request by pharmacists so that they are best equipped with information on lab test results to perform their role in medication management and therapeutic monitoring.

It is well-known that other countries, such as the United States and South Korea, are leveraging pharmacy professionals in community pharmacies for mass testing. Ontario has the opportunity now to continue to be a leading province in Canada when it comes to testing. We are eager to discuss and outline how these models can be deployed in Ontario to increase the capacity for COVID-19 testing.

Recommendation 2: Expand Government Collaboration with Pharmacists for 2020-21 Influenza Immunizations

On May 22, 2020, Ontario Public Health launched the registration process for pharmacies for the Universal Influenza Immunization Program (UIIP) 2020-21. Neighbourhood Pharmacies and OPA have already begun tracking the significant increase in demand for seasonal influenza vaccination in Australia, which is currently experiencing its flu season. It is reasonable to expect that, with heightened attention to population health and growing interest in developing herd immunity, Ontario will see a similar surge in demand this coming flu season. Now more than ever, it will be important to ensure Ontarians are protected against flu. Should this year's flu season coincide with a second wave of COVID-19, our health system will certainly be overrun and the strain on our public health units, hospitals, acute care centres and primary care will be overwhelming, posing yet another serious blow to Ontario's already fragile economy.

Ontario's pharmacy professionals are the most accessible of all healthcare providers, and yet they are probably the most under-utilized. Our members can, want and need to do more to protect Ontarians, especially vulnerable seniors, from seasonal flu. After two years of having to turn away seniors wanting the high-dose influenza vaccine, pharmacists want to ensure that seniors can either remain in their homes or, at the very least, close to home and within their communities to receive the high-dose flu shot. Better utilizing existing capacity in the system by allowing pharmacies to administer this vaccine that has been specifically formulated for seniors will substantially increase capacity in primary care offices and public health units this fall and throughout the 2020-21 flu season. It is times like these that require system efficiency and increased capacity along with streamlined and more timely access to care.

Recommendation 3: Leverage Pharmacists in the Administration of a COVID-19 Vaccine

As demonstrated with a successful flu shot program as well as with 14 different travel-related immunizations, including those for Pneumococcal Disease, Hepatitis A and B, Shingles and Meningococcal Disease, community pharmacies have developed the infrastructure, expertise, efficiencies and accessibility to administer vaccines safely and effectively in the communities they service right across the province. We believe it is time to leverage their infrastructure, expertise, efficiencies and accessibility with a future COVID-19 vaccine.

Neighbourhood Pharmacies and OPA know that the availability of a COVID-19 vaccine will be crucial to ending the pandemic. With nearly 1.4 million Ontarians choosing pharmacies as their preferred access point for flu vaccination, we think you will agree that another tremendous opportunity presents itself with pharmacists being authorized to administer any COVID-19 vaccine, once approved for use. Capitalizing on the high degree of accessibility of pharmacies coupled with the trust and comfort Ontarians have come to expect with pharmacist-administered immunization, again we think you will agree that pharmacies are your solution to ensuring that the greatest number of Ontarians can be vaccinated as quickly as possible.

In summary, by continuing to work together with your government, Neighbourhood Pharmacies and the Ontario Pharmacists Association are confident we can protect Ontarians while you focus on moving toward economic recovery. Pharmacies and pharmacy professionals will continue to do their part on the frontlines of this fight. We stand ready to further support the province and welcome continued dialogue with you and your team.

We wish health and happiness for you and your family throughout these difficult times.

Regards,



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