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May 27, 2016

Ontario College of Pharmacists
Re: Open Consultation Feedback
483 Huron Street
Toronto, Ontario, M5R 2R4

Dear Madam/Sir:

Re: Proposed Changes to the Pharmacy Act (Administration of Vaccines by Pharmacists)

Toronto Public Health (TPH) is writing in support of expanding the scope of pharmacists' practice to include the administration of vaccines (Table 3 of the proposed amendments) as prescribed by an authorized prescriber, and recommends the strengthening of pharmacists' immunization competencies.

Expanding access to immunization has been identified as a pillar in the Ontario Ministry of Health and Long-term Care strategy, *Immunization 2020: Modernizing Ontario's Publicly Funded Immunization Programs*. Enabling pharmacists to administer prescribed vaccines could potentially increase coverage rates, particularly among at-risk populations such as older adults and travellers.

Pharmacists must register their completion of approved injection training with the Ontario College of Pharmacists (OCP) in order to administer vaccines. OCP-approved injection training courses must obtain Canadian Council On Continuing Education In Pharmacy competency-mapped accreditation, with competencies based primarily on the *Immunization Competencies for Health Professionals* established by the Public Health Agency of Canada. However, based on TPH's experience with the Universal Influenza Immunization Program, some approved training courses for pharmacists may not adequately address the immunization competencies. This has resulted in reports to TPH of vaccine administration errors (e.g., wrong injection site); incomplete assessments (e.g., allergies and other contraindications); and infection prevention and control (IPAC) lapses (e.g., re-use of single use devices such as syringes). This may be a particular challenge for community pharmacists who are not part of health care settings and do not have access to comprehensive IPAC programs (e.g., audits, continuous quality improvement activities, hand hygiene program).

TPH strongly recommends that in the implementation of these proposed changes to the Pharmacy Act, OCP reviews and strengthens the approved injection training courses and ensures that the immunization competencies are translated into practice.

Sincerely,

A handwritten signature in black ink that reads "Byaffe". The signature is written in a cursive style with a period at the end.

Dr. Barbara Yaffe
Director, Communicable Disease Control
and Associate Medical Officer of Health