

Ontario College of Pharmacists
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Dear Members of the Ontario College of Pharmacists,

On behalf of the Canadian Pharmacists Association (CPhA), we are pleased to provide comments on the *Public Consultation on Expanded Scope of Practice*. CPhA strongly supports OCP's continued leadership in enhancing the role of pharmacists and pharmacy technicians in Ontario's health-care system. The proposed regulatory amendments represent an important milestone in advancing timely access to care for patients across the province.

1. CPhA's Support for Ontario's Proposed Scope Expansion

CPhA is encouraged by the proposal to authorize pharmacists to assess and prescribe for 14 additional minor ailments, expand pharmacy-based vaccine administration, and increase access to point-of-care and laboratory testing to support clinical assessments. These measures represent meaningful progress toward a more responsive, patient-centred primary care system.

Ontario has already demonstrated that expanding pharmacists' scope leads to improved access, reduced wait times and enhanced patient satisfaction. The proposed additions build on this foundation and help ensure pharmacists can apply their education and clinical judgment to better support the needs of Ontarians.

2. Alignment with CPhA's *National Benchmark for Pharmacy Practice*

CPhA is especially encouraged to see Ontario's proposals advancing toward the broader vision outlined in our [National Benchmark for Pharmacy Practice](#). The Benchmark defines the full range of clinical activities that pharmacists are trained to provide, emphasizing:

- Assessment and management of common conditions, including prescribing
- Testing, screening and monitoring tools that support clinical decision-making
- Vaccine administration and preventive care services
- Patient education, triage and continuity of care

A core component of the Benchmark is the shift from the more narrow concept of "minor ailments" to the broader and more reflective category of **common conditions**—conditions

frequently managed in primary care that pharmacists are educated to assess and treat in accordance with clinical guidelines.

Ontario's proposed changes align well with this vision and position the province for continued evolution toward a national standard of pharmacy practice.

3. Encouraging the Shift Toward “Common Conditions”

While CPhA fully supports the proposed expansion of the minor ailments list, we encourage OCP and the Ministry of Health to consider adopting the broader concept of **common conditions** as the basis for future scope development.

Adopting “common conditions” offers several advantages:

- It more accurately reflects pharmacists' training and competencies
- It better aligns with patient expectations, as individuals frequently seek timely care for common primary care concerns
- It supports regulatory flexibility, allowing scope to evolve as evidence and practice models advance
- It promotes national harmonization, reducing interprovincial variation and health-system inequities

4. System-Wide Requirements to Enable Successful Implementation

To ensure the proposed scope expansion is fully realized and sustainable, CPhA encourages consideration of several system-wide enablers:

4.1 Sustainable, Consistent Reimbursement Models

A clear reimbursement structure for pharmacist assessments, prescribing, testing and other clinical services is essential to ensuring equitable patient access. Sustainable funding enables pharmacies—particularly independent, rural and underserved sites—to allocate appropriate staffing, consultation time and resources to support high-quality care. Without adequate reimbursement, the reach and impact of expanded scope will remain limited and inconsistent.

4.2 Recognizing Pharmacies as Community-Based Clinics

Community pharmacies have long functioned as clinics within their communities, providing assessment, counselling, medication management, vaccinations and triage as part of everyday patient care. While not always described as “clinics,” pharmacies have

consistently fulfilled this clinical role and remain one of the most accessible entry points to the health system.

As key clinics within the broader medical neighbourhood, pharmacies should be fully connected to the rest of the care network through:

- Clear communication and referral pathways with primary care and other providers
- Documentation and information-sharing standards that support coordinated, interoperable care
- Alignment with provincial primary-care strategies, recognizing pharmacy clinics as essential access points for patients

Strengthening these linkages reinforces pharmacy's long-standing clinical role, supports continuity of care, and enhances the collaborative, patient-centred care model across the system.

4.3 Public Awareness and Government Promotion of Services

To maximize the impact of expanded pharmacist scope, Ontarians must be aware of the services available to them in community pharmacies.

A coordinated promotional effort ensures that expanded services are fully understood and utilized by the public.

5. Conclusion

The proposed amendments will significantly enhance access, responsiveness and efficiency across the health-care system.

We encourage OCP and the Ministry to continue aligning Ontario's scope of practice with the national vision outlined in CPhA's *National Benchmark for Pharmacy Practice*, including the shift toward a broader framework grounded in common conditions. Coupled with appropriate system-wide supports—reimbursement, integration and public awareness—Ontario is well positioned to further strengthen the role of pharmacists in delivering high-quality, accessible care.

Thank you for the opportunity to comment. CPhA would be pleased to engage further as this work progresses.

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