



BY EMAIL

Laval, November 18, 2025

Ontario College of Pharmacists
483 Huron Street
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Object: Public Consultation on Expanded Scope of Practice

To Whom It May Concern,

On October 1, 2025, the Ministry of Health announced a series of proposed changes that would expand the scope of practice for pharmacy professionals.

Our organization wants to recognize the Ministry of Health's announcement aiming to expand the scope of practice for pharmacy professionals. We believe that such changes could be beneficial to the population in Ontario to have faster access to care while also allowing better resources management.

As part of this proposal, the Minister of Health has requested that the College draft regulatory amendments to Ontario Regulation 256/24 under the Pharmacy Act, 1991, to enable the proposed expansion of scope of practice for pharmacists and pharmacy technicians in Ontario.

Roche Diagnostics Canada wishes to share comments to the Ontario College of Pharmacists on the proposed expansion of scope of practice for pharmacists and pharmacy technicians in Ontario. We respectfully submit the following recommendations, aimed at maximizing the impact of the draft amendments to the regulation and associated schedules.

Roche Diagnostics

Proper diagnosis is the only way to ensure the right treatment is chosen, yet the current system often presents barriers to access. Roche, a market leader and pioneer in in-vitro diagnostics, is dedicated to improving every step of the patient journey. Our aim is to make diagnostic testing accessible to all. Through Roche Diagnostics Point-of-Care, we offer a comprehensive portfolio of rapid, cost-effective, and user-friendly systems that overcome the complexities of traditional testing, thereby supporting an expanded pharmacy scope of practice.

Explicit addition of the possibility of performing and interpreting point-of-care medical tests

In the context of the current consultation, we recognise all the benefits that will be generated by allowing pharmacists to assess and prescribe for an additional 14 ailments. Additionally, we also appreciate that the Ontario College of Pharmacists will be consulted on the administration of point-of-care tests, like strep throat testing. On

this particular topic, it is important to ensure that testing quality is aligned with the highest standards. Several categories of point-of-care tests are available for the detection of Strep A. There are the traditional rapid antigen tests which leverage lateral flow technology (similar to a rapid COVID-19 test) and molecular POC (mPOC) tests. Some mPOC instruments utilize PCR technology which offer sensitivity equivalent to centralized laboratory molecular tests and greater sensitivity compared to traditional rapid antigen tests. These mPOC tests provide a definitive negative result at the point-of-care, eliminating the need for a confirmatory culture in the case of discrepancies between signs and symptoms and testing result. For the expanded pharmacy scope to truly improve patient outcomes and support antimicrobial stewardship, the College should consider standardizing the use of high-sensitivity, point-of-care PCR technology to avoid the mandatory culture-confirmation step inherent to rapid antigen tests.

Moreover, we would like to leverage this consultation to share other point-of-care testing opportunities that could contribute to the objective of reducing pressure on the primary care providers, walk-in clinics and hospital emergency departments.

1) Establishment of a reimbursement mechanism for diagnostic acts performed in pharmacies

We recommend that medical tests performed using point-of-care diagnostic equipment in community pharmacies be reimbursed to the pharmacist, free of charge for the patient. In some provinces like Quebec¹ and Nova Scotia², certain services are associated with professional fees. For example, the pharmacist can manage the adjustment of medication doses to achieve therapeutic targets. In-pharmacy point-of-care testing could also allow INR measurement and anticoagulation therapy management, screening and monitoring of diabetes by HbA1c measurement and dyslipidemia. Both programs in Quebec and Nova Scotia are doing well and are highly effective, demonstrating that this model significantly improves the quality of patient care.

2) Authorize the use of point-of-care diagnostic equipment in pharmacies

The first recommendation is to add a provision that explicitly allows for the use of an immediate-read diagnostic device in pharmacies, without systematic recourse to an external laboratory. The objective is to help relieve congestion in hospital laboratories and accelerate clinical management, especially for individuals without a family doctor.

3) Optimize the use of expanded scope of practice with immediate treatment

We also recommend that the samplings performed can be integrated into an expanded scope of practice framework. As a reference, here are all Quebec Medical protocols and related prescriptions produced by INESSS³. This framework would allow for:

- Local interpretation of the result
- Immediate initiation of the appropriate treatment by the pharmacist when justified to support Antimicrobial Stewardship
- Goal: To promote rapid and complete care, reduce the use of hospital laboratories, and optimize health network resources
- Relevance: This is particularly relevant for tests that can be performed in pharmacies, such as urine analyses or point-of-care molecular biology tests

4) Other considerations

Successful point-of-care diagnostics implementation is a systemic effort, requiring several critical components to function cohesively. These factors include:

- Operator training and ongoing support
- Robust quality assurance
- Appropriate site selection/model of care
- Community engagement
- Data connectivity/integration
- Supply chain logistics

Roche Diagnostics possesses extensive knowledge and commercial experience across the entire POC ecosystem, encompassing technology, quality control, training implementation, and digital connectivity. We welcome the opportunity to partner with the Ontario College of Pharmacists and the Ministry of Health to offer our expertise and collaborate on developing the necessary implementation frameworks, particularly in working through the critical components listed above, to ensure an effective, and scalable rollout of Strep A testing and future diagnostic expansions in community pharmacies across Ontario.

The recommendations formulated by Roche Diagnostics aim to promote rapid care for patients, particularly those without a family doctor, to improve access to primary care, and to optimize the use of health system resources. Expanding the use of point-of-care medical tests, ensuring their reimbursement, and facilitating the initiation of treatments in pharmacies could contribute to a more effective, accessible, and adapted healthcare offer to the needs of the population.

We invite the Ontario College of Pharmacists to contact us to further discuss the recommendations included in this letter. In the meantime, please accept our best regards.



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References:

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2. Pharmacy Association of Nova Scotia. Community Pharmacist-led Anticoagulation Management Service. <https://pans.ns.ca/cpams>. Accessed 17 Nov 2025.
3. Institut national d'excellence en santé et en services sociaux. Medical protocols and related prescriptions. <https://www.inesss.qc.ca/en/themes/medicaments/medical-protocols-and-related-prescriptions/medical-protocols-and-related-prescriptions.html>. Accessed 17 Nov 2025.