



COLLEGE OF NURSES  
OF ONTARIO  
ORDRE DES INFIRMIÈRES  
ET INFIRMIERS DE L'ONTARIO

THE STANDARD OF CARE.

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October 25, 2019

Nancy Lum-Wilson  
Registrar and CEO  
Ontario College of Pharmacists  
483 Huron Street  
Toronto, Ontario M5R 2R4

Dear Nancy Lum-Wilson,

The College of Nurses of Ontario (CNO) is pleased to provide feedback on the proposed amendments to the General Regulation 202/94 of the *Pharmacy Act* that, if approved, would:

- authorize pharmacists to administer flu vaccine to children as young as two years;
- renew certain prescriptions for up to a year;
- administer certain substances by injections or inhalation for purposes in addition to patient education; and,
- perform point of care tests for certain chronic conditions.

CNO believes that the Ontario College of Pharmacists (OCP) is in the best position to determine the scope of practice of pharmacy and set the necessary standards of practice that are aligned with the public protection mandate.

The following are CNO's comments related to some of the proposed regulations:

#### Point of care tests

The proposed amendment under ss. 36(d) of the *Pharmacy Act*, adds a definition for “point of care test”. It is defined as “a diagnostic test performed on a patient sample at the site of patient care.” Our concern is related to one health regulatory body defining its meaning and the potential for inconsistency of its interpretation among other health professions.

In addition, the *Laboratory and Specimen Collection Centre Licensing Act, 1990* (LSCA) specifies that the practitioner performs laboratory test exclusively for the purpose of diagnosing or treating patients.<sup>1</sup> More specifically, sections 13 and 13.1 of the LSCA provide specific language related to the performance of the point of care test by medical practitioners and naturopaths.

Given that this expansion in the pharmacy scope of practice would be permitted under government regulations, there may be an opportunity for the Ontario government to define

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<sup>1</sup> <https://www.ontario.ca/laws/regulation/900682>

“point of care test” and develop specific regulations within the LSCA to reflect the new role of the pharmacist performing point of care tests. It is possible that the government proposed regulation may provide a different definition for the performance of point of care tests by pharmacists, which may be inconsistent with your proposed definition.

In order to avoid these inconsistencies, CNO recommends that the definition of the “point of care test” be removed from the proposed regulation under the *Pharmacy Act*.

Schedule I and II of the General Regulation 202/94

CNO is supportive of the proposed amendments to Schedule I and II that give authority to pharmacists to administer substances by injection and/or inhalation for purposes that are in addition to patient education and demonstration. The approach in moving from drug lists to drug categories based on the American Hospital Formulary Service (AHFS) classification system is consistent with our proposed approach related to Registered Nurse (RN) Prescribing as well as the direction of other regulators.

However, we noted that you have included both the drug categories and drug lists separately in the proposed regulation. CNO wonders about the utility of listing the drugs and whether including only the categories of drugs without listing individual drugs would suffice. In addition, the inclusion of reference numbers according to the AHFS is an unnecessary detail to include in the regulation. We recommend removing the numbers to avoid the need to make changes to the regulation, should there be future changes to the AHFS classification system.

Overall, CNO believes that the proposed amendments would improve and increase timely access to high-quality care and provide a better experience for the people of Ontario.

If you require additional information, please contact me at [kmccarthy@cnomail.org](mailto:kmccarthy@cnomail.org).

Sincerely,



Kevin McCarthy, RN, MPPAL  
Director of Strategy  
College of Nurses of Ontario

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