



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

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October 25, 2019

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

Dear Nancy:

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates this opportunity to respond to a request from the College for feedback on proposed amendments to the *General Regulation 202/94* of the *Pharmacy Act*, Part VII.3 (Controlled Acts), that, if approved, would authorize pharmacy professionals the expanded scope to:

1. Administer the flu vaccine to children as young as two years old;
2. Renew prescriptions in quantities of up to a 12-month supply;
3. Administer certain substances by injection and/or inhalation for purposes that are in addition to patient education and demonstration.

In addition to these proposed amendments, we also appreciate the opportunity to provide feedback to inform the potential amendments to the *Pharmacy Act* and *Laboratory and Specimen Collection Centre Licensing Act* to enable pharmacists to perform certain point of care tests (POCT) to support their role in medication management and treatment of patients.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations that deliver high value, quality care to Canadians in all models including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative healthcare solutions. We advocate for community-based care through our members' high accessibility and proven track record of providing optimal patient care closer to where patients live, work and play. By leveraging over 10,500 points of care with pharmacies conveniently located in every community across Canada, and over 4,400 within the province of Ontario, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Neighbourhood Pharmacies broadly supports the efforts and progress made by government to create a healthier Canada, and the proposals put forward by the College to expand the scope of practice for pharmacists in Ontario. As a key stakeholder in Ontario's healthcare framework, Neighbourhood Pharmacies has engaged extensively with government and with the College to support and inform initiatives aimed to improve individual and population health. We are committed to expanding access and advancing care for Ontarians by creating capacity in our overburdened system, and feel that the leveraging the accessibility, training and expertise of pharmacists is critical to achieving this.

In keeping with the OCP's mandate to protect the public, we are committed to continuing to work with government and with the College to achieve the vision of Deputy Premier and Minister of Health Christine Elliott to better leverage pharmacists to provide care to patients in the communities where they live, work and play.

We recognize and acknowledge there are some anecdotal concerns relating to workflow and environment; however, these are self-reported and have not been causally linked to public safety. While the implementation and operationalization of these services falls outside the primary purview of the College, ***Neighbourhood Pharmacies and its members are committed to working with the College to evaluate barriers and enablers to maximize adoption and maintain an environment that continues to foster the highest level of patient care.***

We will address each proposal in the submission below.

Administer the flu vaccine to children as young as two years old

Since the inclusion of pharmacists in the UIIP program in 2012, patients have welcomed and embraced their pharmacies as the preferred, trusted and most accessible and convenient destination for receiving their flu vaccine with 34% percent of Canadians receiving their flu shot at their pharmacy (exceeding the 30% receiving their shot at their physician's office)¹. Most of our members' pharmacists have undergone and maintain the required training and qualifications to provide this critical service to patients every year. Pharmacists have become clear advocates for influenza immunization with the tools available to serve their patients accordingly. If appropriate conditions are in place to allow for the pharmacists to administer flu vaccination, this proposal stands to have an impact on the backlog in the healthcare system.

In the absence of any safety concerns relating to vaccinating patients as young as two years of age, ***Neighbourhood Pharmacies supports the approval of this expansion in scope*** as it provides patients with additional points of care for their entire family.

¹ Seasonal Influenza (Flu) Vaccination Coverage Survey Results, 2017-2018.
<https://www.canada.ca/en/public-health/services/publications/healthy-living/2017-2018-seasonal-influenza-flu-vaccine-coverage-survey-results.html>

In reviewing the regulations relating to the administration of flu vaccines, we would also **propose that pharmacists not be restricted only to flu vaccines included in the Universal Influenza Immunization Program**. Coverage through the UIIP should not be required for pharmacists to provide immunization, and pharmacists should also be able to administer privately procured flu vaccines to individuals who do not qualify for UIIP. Similarly, we feel it is important to ensure that scope of practice is consistent across all pharmacists, regardless of their place of practice (i.e. community, hospital or LTC). We would therefore propose that in addition to revising the age limit in Part VIII.3 s. 34(4) of the *General Regulation 202/94 of the Pharmacy Act*, that subsection 34(4)(a) restricting the administration of the flu vaccine to the UIIP also be revoked.

Renew prescriptions in quantities of up to a 12-month supply

As community health care providers, pharmacists are readily available and accessible to provide frontline care to their valued patients. In many cases, patients encounter challenges to visiting and being “followed-up” by their physician on a regular basis. By extending scope in a way that allows pharmacists to renew prescriptions up to 12 months will help patients receive health care services faster and easier. According to Health Quality Ontario, close to 900,000 Ontarians do not have access to a Primary Care Provider; and under 40% of the Ontarians that do have same-day or next-day access to their Primary Care Provider². Pharmacists are well positioned and have the training and expertise to provide a service that can address and bridge these gaps for patients to ensure continuity of care and reduce the risk of medication incidents relating to non-adherence due to the unavailability or inaccessibility of other primary care services, therefore **Neighbourhood Pharmacies supports the approval of the proposed expansion of scope to enable pharmacists to renew prescriptions for up to 12 months**.

As part of implementing this proposal, consideration should be given to **allowing pharmacists full access to lab reports** through the Ontario Laboratories Information System (OLIS) or through accelerated access to Clinical Viewers like ClinnicalConnect and ConnectingOntario, as part of an across-the-board mandate to better support pharmacists and pharmacies in serving their patients. Additionally, it is equally important to **enable pharmacists to order laboratory tests** to equip pharmacists with the necessary tools to have a comprehensive understanding of a patient’s health and medical history in the context of prescription renewals and adaptations. In the interim, as the technical infrastructure of the clinical viewers continues to evolve and grow, **the use of Point of Care Testing to support pharmacists’ role in medication management is critical and will provide pharmacists with some of the tools required to inform clinical decision making when adapting or renewing chronic medications**.

Neighbourhood Pharmacies also suggests that by providing pharmacists with the above tools to support clinical decision making, it will bring pharmacists practicing in Ontario in

² <https://www.hqontario.ca/System-Performance/Primary-Care-Performance>

line with pharmacy practice in other provinces, and will remove some of the barriers experienced by pharmacists practicing in the community setting, that are not experienced in other practice settings.

Administer certain substances by injection and/or inhalation for purposes that are in addition to patient education and demonstration

Since the inclusion of pharmacists in the UIIP program in 2012, patients have welcomed and embraced their pharmacies as the preferred, trusted and most accessible and convenient destination for receiving their flu vaccine. Most of our members' pharmacists have undergone and maintain the required training and qualifications to provide this critical service to patients every year. Given the injection techniques for flu vaccines, other immunizations and other routine injections do not differ for a given route of administration (i.e. intramuscular, subcutaneous, intradermal...), pharmacists are already trained and pharmacies are equipped to administer substances by injection, and have proven to do so very effectively. Similarly, pharmacists routinely counsel and train patients on the self-administration of various inhaled and injected substances, but are currently not permitted to assist patients with the administration nor are they permitted to administer these products to patients. Products that cannot be self-administered, or patients who are unable to self-administer must obtain their prescriptions from their pharmacy and have them administered by their physician – a clear inefficiency and a strain on the health system resources, and an inconvenience to patients. ***Neighbourhood Pharmacies supports the approval of the proposed changes to enable pharmacists to administer a much broader list of substances, beyond the vaccines currently approved, by injection and inhalation, without limitation to the purposes of education and demonstration.*** To realize the efficiencies and benefits of pharmacist administering substances by injection or inhalation, consideration should be given to provide pharmacists with prescriptive authority for publicly funded vaccines as well as other unfunded Schedule I vaccines, such as travel vaccines.

Neighbourhood Pharmacies also believes that building on the success of pharmacy participation in the UIIP, public funding should be extended to pharmacists for all publicly funded vaccines. In addition to the convenience and systemic efficiencies provided by pharmacy-administered vaccines, ***Neighbourhood Pharmacies believes that enabling pharmacists to administer vaccines, and process claims through the OPDP will help improve tracking and reporting of vaccination rates and enables better longitudinal studies evaluating vaccination and downstream hospitalizations, exacerbations... etc.*** We believe this fits very well to support the College's vision of health systems outcomes measurement.

Enable pharmacists to perform certain point of care tests (POCT) to support their role in medication management and treatment of patients

Since 2012, pharmacy practice has seen a steady expansion in scope including the ability for pharmacists to prescribe, renew and adapt prescriptions. Today, pharmacists are considered the primary providers of medication management services. They are routinely consulted by patients and other healthcare providers for advice on medication dosing, effectiveness, and safety. To date, pharmacists have been reliant on various secondary sources of information to support this very important clinical decision making. While Neighbourhood Pharmacies is committed to continuing to advocate for pharmacy access to OLIS and an accelerated process for clinical viewer access, we **support enabling the use of Point of Care Tests to support pharmacists' role in medication management is critical and will provide pharmacists with some of the tools required to inform clinical decision making when adapting or renewing chronic medications**. This equips pharmacists to play a more active role in medication management by utilizing tests that measure Hemoglobin A1C, INR and lipid profiles. Additionally, evidence internationally as well as preliminary results from an ongoing demonstration project in Nova Scotia³ have demonstrated that POCT has the potential to significantly improve patient outcomes.

We propose that consideration also be given to enabling POCTs for the purposes of screening. Such tests may include but should not be limited to screening for HIV, H.pylori, Hepatitis C and Strep. Pharmacists are well positioned to provide convenient and accessible testing that can facilitate early detection of certain conditions. Without question, the negative and positive predictive value of these tests should be carefully evaluated, and pharmacists should be trained on the interpretation of test results.

We also propose that testing not be limited to the physical boundaries of the pharmacy. As a profession that has always practiced the highest standards of hygiene and implemented continuous measures to enhance safeguards in our practice settings, pharmacists are well trained in delivering care in a safe and hygienic manner to members of our community. By allowing pharmacists the flexibility to continue to deliver this high standard of care in locations beyond the pharmacy counter and co-located areas, pharmacists will be in an enhanced position to provide greater access and new care pathways for patients in Ontario. Other provinces that have enabled POCT have indicated that "POCTs must only be conducted in an environment that is clean, safe, private and appropriate for collecting the sample, conducting the test, storing the device and supplies, and managing hazardous waste disposal."⁴ Pharmacists are well trained and well prepared to apply a high degree of hygiene and safeguards if given the opportunity to deliver POCT in any setting – both within the pharmacy's physical boundaries and outside of them.

³ <https://pans.ns.ca/cpams>

⁴ https://abpharmacy.ca/sites/default/files/Standards_Lab_POCT.pdf

Neighbourhood Pharmacies suggests that by providing pharmacists with the above tools to support clinical decision making, it will bring pharmacists practicing in Ontario in line with pharmacy practice in other provinces, and will remove some of the barriers experienced by pharmacists practicing in the community setting, that are not experienced in other practice settings. Additionally, it will better position and enable pharmacists in community to engage in more collaborative practice with other healthcare providers.

Supporting the successful implementation of these proposed changes

While we welcome and support the proposed changes outlined in this consultation, successful implementation is critical to realizing the broad benefits to the public and to the healthcare system. Neighbourhood Pharmacies offers that while implementation and workflow are outside the purview of the College, recognition of the importance of remuneration as an enabler is critical, as these services are not only labour-intensive but also require significant investment in training, infrastructure and resources to support their successful implementation. Fair funding for immunization, assessments leading to prescribing activities (i.e. renewals or adaptations) supported by Point of Care Testing, and administration of substances by injection or inhalation is critical to the successful implementation and uptake of these services, which in turn is critical to realizing the broader health system benefits these proposed changes have the potential to deliver.

Neighbourhood Pharmacies recommends, in collaboration with the Ontario Pharmacists Association, the immediate establishment of a Pharmacy Workplace Taskforce including the following stakeholders:

- The College, OPA and Neighbourhood Pharmacies
- Independent and Corporate Pharmacy Operators
- Front-line staff pharmacists representing various practice settings (community, hospital, FHTs, specialty and LTC...)
- Academia
- Pharmacy Technicians

We propose that this group be facilitated by a third party, and that it have a defined mandate to evaluate and address, with a collaborative, multi-faceted approach, the real and potential operational challenges and understand environmental variations between various practice settings (enablers, barriers...).

Conclusion

Neighbourhood Pharmacies represents Canada's leading pharmacy brands that deliver high value, quality care to Canadians in all models including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass

merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative healthcare solutions. We are encouraged by the proposed changes to expand pharmacist scope of practice, and appreciate the opportunity to comment through this submission, and through ongoing and upcoming dialogue relating to the successful implementation of these services. We believe that through a collaborative approach that truly engages the critical stakeholders, we can identify the pathways to a successful implementation of these valuable services that have the potential to alleviate the pressures on the healthcare system today.

Please do not hesitate to contact me at shanna@neighbourhoodpharmacies.ca should you have any questions, comments or concerns.

Thank you,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a period at the end.

Sandra Hanna, RPh.
Interim Chief Executive Officer