



Ontario Nurses' Association

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Ontario College of Pharmacists
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Dear Sir or Madam:

Re: Feedback on Proposed Changes to Enable an Expanded Scope of Practice for Pharmacists

The Ontario Nurses' Association (ONA) welcomes the opportunity to provide feedback on the proposed changes to enable an expanded scope of practice for pharmacists. ONA respects the role of pharmacists within our health-care system and we share your commitment to ensuring that Ontarians have access to the best quality in front-line health-care services.

We note that the proposed changes include authorizing pharmacists to administer the flu vaccine to children as young as two years. ONA is concerned that these changes will negatively impact the provision of quality patient care and have been drafted without due consideration of the impact on other health-care professionals operating in the system.

Public Health Nurses (PHNs) currently provide services in public health-run flu clinics and other forms of immunization clinics, including school visits. Many of these clinics specifically provide immunizations for children under the age of six years. PHNs also provide care and service in infant programs and with new moms, including the *Healthy Moms*, *Healthy Babies* programs. Public health nurses are highly trained professionals with a wealth of experience working with babies and young children, providing assessments and continued care.

In the circumstances of an expanded scope for pharmacists, it also would be a concern as to who would be responsible to monitor the young patient's response following the immunization administration. Particularly given this younger age group, and the busy pharmacy setting, who would be responsible for observing young patients for an untoward reaction? Public health nurses are experts in screening and observing children after immunizations and ONA believes this role should be preserved.

Since the provincial Ministry of Health is currently undertaking consultations on an expanded scope of practice for RN prescribing, ONA believes these processes should be undertaken alongside one another. Proposals for expanded prescribing powers among health professionals should be considered together and on the best available evidence for patient care, instead of operating in silos.

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The precedent of the agreement between the College of Pharmacists and the College of Nurses in Nova Scotia on expanded prescribing powers could be a model to follow.

To ensure confidence in the process, ONA requests that the College of Pharmacists address concerns that have been raised in the public discourse about the potential for conflict of interest as pharmacists gain the power to prescribe the medications that they also dispense.

Nurses have long advocated for an integrated health-care system – where patients can access the right care, in the right place, at the right time, by the right provider. We urge the College of Pharmacists to consider this perspective as you are reviewing these proposed changes.

Sincerely,

ONTARIO NURSES' ASSOCIATION



Vicki McKenna, RN
President

vm/ec/lw

C: ONA Board of Directors