ONTARIO COLLEGE OF PHARMACISTS
BOARD OF DIRECTORS MEETING
AGENDA
MONDAY, JULY 20, 2020 – 1:00 P.M.

VISUAL -  http://ontcollege.adobeconnect.com/boardofdirectors
Please note – you’ll have to dial in as well as log into the website above.

1. Noting Members Present

2. Declaration of Conflict

3. Approval of Agenda

4. For Decision
   4.1 Briefing Note – Approach to Masking in Pharmacies ………………..Appendix 4.1

5. Other Matters
   5.1 Verbal Update - Delay of December Board Meeting

6. Motion of Adjournment
INITIATED BY: Laura Weyland, Board Chair and Billy Cheung, Vice-Chair

TOPIC: Approach to masking in pharmacies

ISSUE: The Board is asked to consider its position on masking in pharmacies.

PUBLIC INTEREST RATIONALE: The use of medical and non-medical masks have been shown to decrease the transmission of droplets and thereby decrease the likelihood of the spread of COVID-19. Given the indoor environment pharmacy personnel practice in and their interactions with patients, the use of masks within a pharmacy should be given consideration in the public’s interest.

BACKGROUND:
Pharmacies and pharmacy teams are on the frontline for supporting patients and the public during this pandemic. As a result, pharmacies across the province have taken steps to minimize the risk of COVID-19 for their staff and their patients. For some pharmacy professionals, physical barriers and other innovative methods have been implemented to address the current but evolving understanding of COVID-19.

Current understanding is that COVID-19 is transmitted via droplets during close, unprotected exposure, and when in direct contact with surfaces, objects and other materials that have been recently contaminated with the virus. Studies have documented the presence of virus on surfaces in the environment of patients who have tested positive for COVID-19; however the relative importance of indirect contact transmission, by droplets spreading from a patient to an environmental surface to another individual, is uncertain.

Evolving evidence has recently been provided on the role of aerosol/airborne transmission, leading experts to debate the extent aerosols contribute to the spread of COVID-19. Activities such as coughing, sneezing and breathing can result in the spread of aerosols over varying distances, in some cases greater than 2 metres, and is impacted by factors such as adequate air flow. The debate around this topic is still inconclusive but it is important to note the potential of airborne transmission would significantly impact prevention strategies including the importance of mask usage, particularly in indoor environments.

The highest risk of exposure to the virus causing COVID-19 is through exposure to respiratory secretions through direct or indirect contact with an infected person’s cough or sneeze. Masks for source control reduce transmission of infection from the wearer to those around them. Non-medical masks do not function to filter inhaled air, however, protect the wearer’s nose and mouth from droplets, contact and spray. This protects against the potential risk of contracting COVID-19 from someone who does not show any symptoms (i.e., asymptomatic or pre-symptomatic transmission).

To prevent communicability and slow the spread of the virus, Health Canada and the Ontario Ministry of Health (MOH), recommend the wearing of a non-medical mask or facial covering when it is not possible to maintain a 2-metre physical distance from others. Guidance documents are
available through the MOH and Public Health Ontario (PHO), which include, **COVID-19 Guidance: Community Pharmacies, Non-medical Masks and Face Coverings**, and **Universal Mask use in Health Care Settings and Retirement Homes**.

Recently, there has been public support for mandating the wearing of masks in indoor community spaces to contain the spread of the virus. Local officials, in consultation with their respective public health units, have been or are considering enacting by-laws under the *Health Protection and Promotion Act*, taking into account factors such as the rates of infection and transmission in the community (see Appendix 1) In all other regions, the provincial directive applies which strongly recommends masks when social distancing is not possible.

Currently, three Pharmacy Regulatory Authorities (PRAs) have issued guidance that recommend pharmacy personnel wear surgical/procedural masks when providing direct patient care or if physical distancing cannot be maintained (either through the use of physical barriers or maintaining a distance of two meters) between themselves and patients or other pharmacy personnel. The guidances are intended to provide pharmacy professionals with situational information and advice, in recognition that the information is subject to change. Other provincial regulators direct registrants to the provincial health authority (see Appendix 2).

**ANALYSIS:**

The College has been collaborating with the government and stakeholders across the system on matters pertaining to the pandemic, including on the topic of masks in pharmacies. In determining the appropriate response of the College in mandating masks in pharmacies across Ontario, it is helpful to review the principles that have guided how the College identifies the regulatory levers needed to support the profession throughout the pandemic that are relevant to the issue at hand:

1. Government and public health should be and remain the most current, reliable, and accurate sources of information for health professionals and the public regarding COVID-19;
2. The College has a defined role specific to its legislated mandate and objects which guides practice and policy priority setting and communication within its public-protection responsibilities;
3. Collaboration with health system partners, including active partnerships on joint practice-related resources and sharing of each other’s materials, is critical to supporting healthcare professionals;
4. Regular, nimble and concise dissemination of information during a time of crisis is important to help registrants and the public gain timely access to tools and resources as details emerge; and
5. Consideration should be given to frequency of contact from different sources in order to minimize the impact of information fatigue as the pandemic evolves.

The government and public health units continue to monitor the pandemic and have been the source for the most current information based on the best available data on COVID-19. In Ontario a regional approach has been taken in moving through the three stages of re-opening and in enacting by-laws for mandatory masks, based on evidence and information relevant to the specific regions.

The College has a role to play in promoting safe and accessible practice environments through clear expectations and guidance for pharmacy professionals to keep themselves and their patients safe. Under the *Regulated Health Professionals Act, 1991*, section 3(1) the College has the authority to develop, establish, and maintain standards and programs to promote the ability to respond to changes in practice in environments, advances in technology and other emerging
issues. In considering how the College may respond to the issue of masks in pharmacies, it is important to acknowledge that the College does not have any legislative or regulatory jurisdiction over the public.

The College has continued to support the position of national, provincial and local authorities with respect to masking policies by directing pharmacy professionals to related resources on our website and through College communications. As of July 13th, 20 of the 34 public health units have a mandatory mask by-law in effect and 6 have Council meetings to debate the issue. Additionally, several businesses and hospitals across the province have established mandatory masking policies for staff and patients who enter the premises. In the remaining regions, public health guidance continues to recommend masking in all public places, including pharmacies, if physical distancing is not possible.

Given the variable approach in different regions, and considering the principles that the College has been applying to guide pharmacy professionals in their practice, the Board is being asked to consider if further measures for masking in pharmacies should be put in place. The following are two potential positions:

Position 1 (status quo): The College continue to support the guidance and policies made by the provincial and municipal authorities respecting mask use, including mandatory use in some regions, and expects pharmacy professionals to abide by them.

Position 2 (enhanced measures): The College expects continuous masking for all pharmacy professionals (allowing for individual accommodation as necessary) in all pharmacies in the province to prevent exposure and spread of COVID-19.

Board discussion and debate on position

Should the Board choose to support position 2, the Board must consider which regulatory tool would be most appropriate to reinforce the position. According to right-touch regulation principles, the response should be outcomes focused and proportionate to the risk involved.

There are a range of instruments to support and communicate the Board’s position. The following is a list of the regulatory tools the College can implement to mandate continuous masking for pharmacy professionals (see Appendix 3 for definitions of the tools):

- Standard
- Guideline
- Policy
- Guidance
- Position Statement
- Fact Sheet

Following are some factors to consider in deciding which tool may be most appropriate:

- **Responsiveness**
  - The issue is time-sensitive and requires a timely response
  - Standards require stakeholder consultation and Board approval

- **Currency and relevance**
  - Epidemiological and scientific evidence is evolving, as is the understanding of virus transmission
  - Guidance, position statements and fact sheets are most nimble as they can be readily edited based on emerging information
• **Implementation**
  o Enforcement is most explicit with Standards, as failing to follow a standard of the profession is considered professional misconduct in regulation
  o College policies and guidance documents, although less explicit, also set out expectations to which registrants may be held

• **Impact**
  o In order to significantly slow the spread, studies have shown that universal masking (at least 80 percent of the population) is necessary
  o Recommendations can include how pharmacy professionals can promote the use of masks for patients

**RECOMMENDATION:** That the Board establish a position on masking in pharmacies, see the positions above (Position 1 & 2), and determine the most appropriate regulatory tool to reinforce the selected position.

**NEXT STEPS:** College staff will develop the appropriate supporting documents as per the Board’s decision and communicate the Board’s position broadly to pharmacy professionals and patients accordingly.

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1 Public Health Ontario. COVID-19 – What we know so far about...routes of transmission.
2 Public Health Ontario COVID-19: Aerosol Generation from Coughs and Sneezes
3 John Hopkins Centre for Health Security COVID-19 Updates July 6
4 Transmission of SARS-CoV-2: implications for infection prevention precautions
Map of Ontario Public Health Units that have Implemented Mandatory Indoor Mask Bylaws
July 13th, 2020

Bylaw Status
- Green: Bylaw Passed
- Light Green: Bylaw in Planning/Decision Phase
- Orange: No Bylaw Announcement

Code | Name |
--- | --- |
ALG | Algoma District |
BRN | Brant County |
CHK | Chatham-Kent |
DUR | Durham Regional |
EOH | Eastern Ontario |
GBO | Grey Bruce |
HAL | Halton Regional |
HAM | City of Hamilton |
HDN | Haliburton-Northumberland |
HKP | Haliburton-Kawartha-Pine Ridge District |
HPE | Hastings and Prince Edward Counties |
HPH | Huron Perth |
KFL | Kingston-Frontenac and Lennox and Addington |
LAM | Lambton |
LGL | Leeds-Grenville and Lanark District |
MSL | Middlesex-London |
NIA | Niagara Regional Area |
NPS | North Bay Parry Sound District |
NWR | Northwestern |
OTT | City of Ottawa |
OXE | Oxford Elgin St. Thomas |
PEL | Peel Regional |
POP | Porcupine |
PTC | Peterborough County-City |
REN | Renfrew County and District |
SMD | Simcoe Muskoka District |
SUD | Sudbury and District |
THB | Thunder Bay District |
TOR | City of Toronto |
TSK | Timiskaming |
WAT | Waterloo |
WDG | Wellington-Dufferin-Guelph |
WEC | Windsor-Essex County |
YRK | York Regional |
**APPENDIX 2: JURISTICTIONAL SCAN: APPROACH TO MANATORY MASKS**

Provincial Pharmacy Regulatory Authorities (PRA)

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| BC    | Refer to government directives | • Follow [BC Centre for Disease Control](https://www.bccdc.ca) and BC Ministry of Health.  
     |                              | • Pharmacy staff who have direct contact with or are unable to maintain a safe physical distance from patients and customers must use appropriate PPE: surgical or procedural mask, eye protection, gloves.  
     | AB    | College recommendation       | • **Continuous making:** Pharmacy personnel should wear a surgical/procedural mask continuously if they provide direct patient care or cannot maintain adequate physical distancing (either through use of a physical barrier or by maintaining a distance of two meters) between themselves and patients or other pharmacy personnel.  
     |       |                              | • Pharmacists, pharmacy technicians, and pharmacy team members should review the [AHS Guidelines for Continuous Masking](https://www.ehsrc.gov.ca/).  
     | SK    | College guideline updated    | • [Infection Control Guidelines](https://www.ehsrc.gov.ca/) were updated by the College to help pharmacies ensure that routine and advanced practices are in place to prevent transmission of communicable diseases and infections to the public and pharmacy staff.  
     | MB    | Refer to government directives | • Refer to [Shared Health Manitoba](https://www.gov.mb.ca/), which has released [Provincial Personal Protective Equipment Requirements](https://www.gov.mb.ca/).  
     |       |                              | • Pharmacists are asked to use their professional judgement regarding using personal protective equipment (PPE) based on point of care risk assessment.  
     | NS    | College guidance document    | • The College has a guidance document on [Pharmacy Infection Control Measures During COVID-19](https://www.ehsrc.gov.ca/).  
<pre><code> |       |                              | • Pharmacy staff members should use a surgical/procedure mask when they are unable to maintain a distance of 2 metres (6 feet) from co-workers in the dispensary or when performing direct patient care that requires the patient to be within 2 metres (6 feet) (e.g., drug administration, point of care testing, physical assessment). |
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- All health care workers in nonclinical settings must wear a surgical/procedure mask when physical distancing cannot be maintained (e.g. pharmacists providing counselling to clients who cannot maintain the two meters physical distancing). |
| NL       | College recommendation | - The College [recommends the following](https):  
- Front-line pharmacy staff could possibly be exposed to the COVID-19 virus as they are interacting with patients who may be infected; therefore, personal protective measures should be in place.  
- The Government of Canada website for health professionals indicates that health care workers should use a risk assessment approach before and during each patient interaction to evaluate the likelihood of exposure.  
- Pharmacy professionals should aim to prevent exposure; however, if a pharmacy professional is in a position where they need to provide direct patient care to someone who may be experiencing COVID-19, they should follow the recommended contact and droplet precautions for health professionals. |
APPENDIX 3: REGULATORY TOOLS FOR CONSIDERATION

The following tools are intended to assist the profession in ensuring quality patient care and safe practice environments. While these resources are meant as tools, registrants must always use their professional judgement and knowledge to assess and act appropriately within each situation.

**Standard:** Standards outline the minimum mandatory expectations that must be met by the profession. Examples of Standards are:

- **Standards of Operation:** Standards of Operation set expectations around the operation of accredited pharmacies in Ontario.

- **Standards of Practice:** Standards of Practice set expectations around the performance that all registrants must meet. Regardless of a registrant’s role or practice environment they must perform to the level specified in the Standards of Practice.

**Guideline:** Guidelines outline more detail around the expectations of a Standard and relevant legislation and how to apply the Standard and/or legislation to support optimal practice. Guidelines are meant as references to be used alongside, not in place of, the Standards and/or legislation. Operational guidelines outline optimal operations of a pharmacy.

**Policy:** Policies serve as a benchmark against which the conduct of the individual registrant is evaluated. Operational policies outline the College’s expectations relating to specific topics within pharmacy operations.

The College develops policies through a rigorous process. More information about the College’s policy process, including what triggers policy development or review, can be found on the College’s Policy Process infographic.

**Guidance:** Guidance provides information that articulates or supports the College’s expectations in practice for topics/areas that are developing or emerging and will likely be changing in the future. They are based on the circumstances and context at the time they are published.

**Position Statement:** Position statements outline the College’s regulatory or policy stance on emerging issues around a specific area of practice. Position statements can change as they are based on the circumstances and context at the time they are published.

**Fact Sheet:** A fact sheet summarizes relevant legislation, policies and guidelines in one place.

**Framework:** A conceptual structure intended to support or guide the building of an approach or an objective. It can set out the conditions required to achieve the desired performance or outcome, and often ensures the inclusion of guiding principles in its approach.