

May 20, 2120

Submission by Shoppers Drug Mart and Loblaw Pharmacies Regarding the Draft Virtual Care Policy

Shoppers Drug Mart and Loblaw Pharmacies appreciate the opportunity to comment on the Ontario College of Pharmacists (OCP) draft Virtual Care Policy.

The pandemic has had a significant impact on how patients choose to receive care, and whether through necessity or choice, have embraced virtual care options. Similarly, pharmacists have embraced a range of technologies to meet the needs and preferences of their patients.

We were pleased to see that the draft policy is flexible in enabling pharmacists to use the technology that best meets the needs of their patients and the pharmacy while complying with applicable privacy requirements. This approach also allows for the evolution of care options overtime, for example, telehomecare options.

The definition of Virtual Care excludes interactions that occur with patients using a telephone. We agree that the components of the policy should not apply to this type of interaction. However, the exclusion without explanation creates a risk. For example, MedsCheck can currently be delivered virtually or by phoneⁱ, the simple omission of 'by phone' in the policy that enables this approach, combined with the implementation of the OCP draft Virtual Care Policy as currently written, could result in an interpretation that many MedsCheck services currently provided by phone would need to be delivered through other virtual means, for example, by videoconference. This would result in a decreased ability for pharmacists to provide this valuable healthcare service to their patients. We suggest that clarifying language is included in the policy to indicate that while telephone interactions are excluded from the provisions of the policy, they are considered to be an acceptable alternative to virtual care.

We were also pleased to see that there is flexibility to obtain explicit consent either orally or in writing. As both the Health Care Consent Act and Personal Health Information Protection Act use the term 'express' rather than 'explicit' consent, we are seeking to understand the reason behind the use of the term 'explicit and any specific implications associated with the selected terminology', and assurance that verbal consent is sufficient.

Thank you for considering our input and recommendations.

Sincerely,

Deb Saltmarche, Senior Director Professional Affairs

Cc: Ashesh Desai, Executive Vice President Pharmacy

For questions on our submission please contact Deb Saltmarche,
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ⁱ https://www.health.gov.on.ca/en/pro/programs/drugs/opdp_eo/notices/exec_office_20200320.pdf