



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
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de quartier**

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Shenda Tanchak
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RE: Expanded Scope Regulatory Amendments (Regulation 202/94 of the Pharmacy Act, 1991)

Dear Registrar Tanchak

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) advocates for pharmacies' role in caring for Canadians. We represent leading pharmacy organizations, including chain, banner, long-term care, grocery chains, pharmacies focused on complex and specialized therapies, and mass merchandisers with pharmacies. Across Canada, we advance the delivery of care through close to 11,500 community pharmacies and their teams, serving as integral community health hubs in urban, suburban, rural, remote and First Nations neighbourhoods.

We are pleased to provide the Ontario College of Pharmacists (OCP) with some feedback on the Expanded Scope Regulatory Amendments as proposed to Regulation 202/94 of the Pharmacy Act. We understand the amendments proposed will:

- Give pharmacists and pharmacy technicians authority to administer the RSV vaccine
- Give pharmacy technicians authority to administer vaccines from [Schedule 3](#) of [O.Reg. 202/94](#)
- Remove age restrictions for the administration of influenza and other [Schedule 3](#) vaccines by pharmacists and pharmacy technicians
- Transition authority for pharmacists and pharmacy technicians to administer the COVID-19 vaccine from the Regulated Health Professions Act (RHPA), Controlled Acts Regulation (107/96) to the Pharmacy Act, General Regulation (202/94).
- Give pharmacists authority to prescribe oseltamivir (Tamiflu)
- Transition authority for pharmacists to prescribe Nirmatrelvir/ritonavir (Paxlovid), from the Regulated Health Professions Act (RHPA), Controlled Acts Regulation (107/96) to the Pharmacy Act, General Regulation (202/94).

We wish to state our unequivocal support for the proposed amendments, that give more regulated pharmacy professionals the permanent authority to administer and prescribe more vaccines and antiviral treatments to more patients. We have, in prior engagements, advocated for many of these specific changes. One of our key priorities is to shape policy to support the role of community pharmacies and their teams as community health hubs, providing sustainable

public health and primary care service. Canadians should be able to expect a consistent set of core health care services provided at their local community pharmacy, no matter where they live. Routine immunization is one of the critical public health services that should be enabled and expanded in community pharmacies, and we are very pleased to see the proposed amendments which support this expansion.

An expanded role for pharmacy teams in prescribing and administering vaccines and antiviral therapies has numerous benefits:

- **Increases timely access to vaccines and treatments.** Community pharmacies and their teams have the infrastructure and training to administer vaccines and prescribe antiviral treatments. Ontario pharmacies have administered more than 11 million COVID-19 vaccines to date and carried out more than 170,000 COVID-19 antiviral assessments resulting in a prescription.^{1,2} Enabling pharmacy teams to provide more vaccine and antiviral products will provide Ontarians with improved access to preventative care and treatment.
- **Prevents new disease outbreaks.** There has been a concerning decrease in routine vaccinations for vaccine preventable diseases such as pneumonia, shingles and HPV during the pandemic. As many as one in four adults, and up to 35% of children, have missed a routine vaccination.³ Increasing pharmacy involvement to catch-up on missed vaccinations will help mitigate new disease outbreaks and keep Ontarians safe.
- **Provides more equitable vaccine access.** Most publicly funded routine vaccines are available in primary care offices and public health clinics but are not distributed to community pharmacies. This can limit patient access to vaccines. Approximately 70% of immunizations missed or delayed during the pandemic could have been avoided with access to a vaccinating healthcare provider.³ Pharmacies are rooted in communities across the province making vaccine access more equitable to all.
- **Increases vaccine uptake.** More than 60% of Ontarians would immediately accept a routine immunization at their local pharmacy, citing convenience – including proximity to home, extended hours, ability to walk-in, and ability to ask questions – as the key driver.⁴ Evidence also shows that pharmacy-based immunization services can lead to increased vaccination uptake.
- **Increases healthcare capacity.** Many essential healthcare workers, especially nurses and doctors, are burned out and in short supply. Community pharmacies have the benefit of leveraging their entire pharmacy team, including pharmacy technicians, students and potentially other health care providers, to provide vaccinations, adding much needed capacity.

We offer two additional **scope of practice recommendations** relating to immunization activities that will further enable pharmacy professionals to provide patients with safe and effective care:

- Provide pharmacy professionals with the scope to administer all immunizations.** Pharmacy professionals are medication experts with the skills and competency to administer COVID-19 and influenza immunizations and carry out all clinical and technical tasks associated with this service, including assessing patients' eligibility and suitability, vaccine administration, documentation and preventing adverse events. However, pharmacy professionals are only authorized to administer 10 of the 17 vaccine preventable diseases targeted by the Publicly Funded Immunization Program in Ontario. In many situations where the patient is eligible for a publicly funded vaccine, the pharmacist must refer the patient back to their primary health care provider or local public health unit who can administer the vaccine free of charge to the patient. This creates a barrier to access which can impact uptake of regular immunization opportunities. Leveraging pharmacy teams' existing competencies and experience will expand the range of publicly funded routine immunizations patients may access via their community pharmacy. In fact, we understand the Vaccine Policy and Programs Branch at the Ontario Ministry of Health is currently exploring options for enabling pharmacy professionals to administer all publicly funded routinely recommended immunizations, and we are very supportive of this direction to continue to unlock pharmacy's potential to be a valuable partner to the primary care and public health systems.
- Provide pharmacists with the scope to prescribe all vaccines.** The prescription landscape for routinely recommended publicly funded vaccines is fragmented. Some vaccines require a prescription, some do not. This leads to confusion and miscommunication to the public on the steps they need to take to obtain a vaccine at their pharmacy. Enabling pharmacists with the scope to prescribe all vaccines would serve to uncomplicate the patient journey and minimize interactions with the health system. Ontarians could be assessed at a pharmacy in their community, at a time that is convenient for them, have their vaccine prescribed and administered all in one place. This means faster service, fewer demands on the healthcare system and better access overall to care. Pharmacists in Ontario already have demonstrated their competency and proficiency in prescribing medications for minor ailments and COVID-19 antivirals. Expanding prescribing authority to all routine vaccines is a logical next step.

While we recognize this is outside of the mandate of the College, we would like to take this opportunity to reiterate the 3 additional key enablers that will support pharmacy team members in successfully implementing the proposed scope of practice enhancements:

- Leverage the existing pharmaceutical supply chain to streamline the distribution of vaccines to pharmacies.** Except for COVID-19 and influenza vaccines, publicly funded vaccines are not accessible to pharmacies through their existing wholesale distribution systems. Leveraging these existing robust systems to distribute vaccines to pharmacies will vastly expand access to these vaccines in virtually every community across the province. Wholesale distribution will streamline the process, supporting more efficient delivery by getting products to patients in less time. In addition, better line of sight into the supply channel will also result in less vaccine wastage. More accessible stock on hand will allow pharmacy teams to turn more patient interactions into

immunization opportunities, overall helping the province to increase immunization rates and catch-up on delayed care.

- **Implement centralized immunization records.** At the present time, depending on where a patient receives a publicly funded immunization (i.e., from a local public health unit, primary care office, or pharmacy), the record is stored in different systems used by each sector that do not integrate with one another. The availability of a centralized database that includes all immunization records for patients is critical to the success of any provincial immunization program as it would be beneficial to all healthcare providers involved as well as increase efficiencies in the healthcare system. For example, the lack of access to patient immunization records can consume significant amounts of the pharmacy team's time to piece together vaccine histories from fragmented patient records, memories and contacting other healthcare providers to confirm immunization status. If pharmacies had access to complete patient vaccination records, that time could be used more efficiently to provide care to patients. In addition, a complete immunization record would allow for easy identification of patients who may be missing vaccinations and enable a streamlined targeted approach to reaching out to these individuals to increase vaccination rates.
- **Provide fair and reasonable remuneration to pharmacies for the administration of publicly funded vaccines.** Pharmacies depend on immunization service fees to support a variety of clinical and technical functions required for the administration of an immunization, including assessing patients' eligibility and suitability, vaccine administration, documentation, preventing adverse events and following up with the patients' primary care providers where necessary. Ontario's pharmacies currently have the lowest immunization fee across the country. The provision of fair and reasonable remuneration for pharmacy services is critical to successful uptake of expanded routine immunization services. Ensuring that pharmacies can sustainably deliver this service will support maximal participation of pharmacies and increase timely and convenient access to routine immunizations in communities across the province.

The Neighbourhood Pharmacy Association of Canada appreciates the opportunity to contribute feedback to this consultation. We also wish to congratulate the Ontario College of Pharmacists on its forward thinking in ensuring Ontarians can have access to the best protection possible this upcoming respiratory viral season. We are pleased to support the College and all sector stakeholders in further unlocking community pharmacy's potential as a supporting partner in healthcare delivery while providing safe and effective medication services.

Sincerely,



Sandra Hanna
CEO

References

1. Ontario Ministry of Health. COVAX Pharmacy Daily Summary. August 2023
2. Ontario Ministry of Health. COVID-19 Antiviral (Paxlovid) Dashboard. July 2023
3. Neighbourhood Pharmacies and 19 to Zero. Public Poll on Canadian Attitudes to Immunization in Community Pharmacies. September 2021
4. Neighbourhood Pharmacies and 19 to Zero. Public Poll on Canadian Attitudes to Immunization in Community Pharmacies. (Ontario Data Subset) September 2021