

July 25, 2023

Consultation on Expanded Scope Regulatory Amendments
Ontario College of Pharmacists
consultations@ocpinfo.com

RE: Consultation on Expanded Scope Regulatory Amendments

Dear Ontario College of Pharmacists,

On behalf of McKesson Canada Corporation (“McKesson Canada”) and our over 13,000 of employees across Canada, we would like to provide our input on “Consultation on Expanded Scope Regulatory Amendments.”

McKesson Canada is the country’s largest healthcare services company and distributor of pharmaceutical products, and we are uniquely positioned within the healthcare sector. Our role as a pharmaceutical wholesale distributor, pharmacy banner and retail chain operator, patient-care innovator, and specialty solutions provider make us one of the few companies that operates in and touches every aspect of the healthcare system, offering us a unique 360° view.

We would like to provide input on the proposed expanded scope of practice regulatory amendments that would:

- allow pharmacists and pharmacy technicians to administer additional vaccines, including the RSV vaccine;
- allow pharmacists and pharmacy technicians to administer vaccines from [Schedule 3](#) of [O.Reg. 202/94](#);
- allow pharmacists to prescribe oseltamivir (Tamiflu);
- remove age restrictions for the administration of influenza and other [Schedule 3](#) vaccines by pharmacists and pharmacy technician; and
- transition authority for pharmacists and pharmacy technicians to administer the COVID-19 vaccine and 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)*.

McKesson Canada recognizes that pharmacists are a large and underleveraged resource of trained and registered professionals that can help alleviate the primary care pressures on the health system. Throughout the pandemic, Ontario’s pharmacists and pharmacy technicians have proven themselves extremely capable of running vaccination clinics and building and reinforcing the trust and confidence of their communities. The convenience to patients offered by pharmacies’ accessibility, longer working hours, and ubiquity within all communities has long been recognized as a significant untapped medical resource, at a particularly challenging time for the health sector.

However, the pressures of the pandemic and post-pandemic eras on the pharmacy sector have been significant and consequential. Pharmacists and pharmacy technicians have been stepping up to fill health system gaps and provide health care to underserved patient populations, often in addition to their regular daily tasks and with

insufficient or no additional compensation. Expanding the scope of practice needs to be supported by an acknowledgement that the new activities will take time and resources away from the existing daily duties of pharmacists and pharmacy technicians. Adequate funding mechanisms are required to compensate pharmacies for the extra workload and hiring of additional staff. Pharmacists and pharmacy technicians are highly trained and capable health care providers, and their contributions to the health care system need to be recognized and compensated by the Ontario government in a befitting manner.

Given these considerations, McKesson Canada believes that a successful expanded scope rollout requires that pharmacists and pharmacy technicians receive the training necessary in order to provide the best service to their patients at all times. Rather than simply adding another task to the already strained pharmacy sector, the Ontario College of Pharmacists (OCP) and Ontario government should ensure that professional support and adequate compensation mechanisms are in place and adapted to the proposed expanded scope of practice to set up pharmacists and pharmacy technicians for success.

In order to ensure the successful rollout of the expanded scope intended by these regulatory amendments, the OCP and the Ontario government should make available free access to additional training and refresher courses on injection administration to all pharmacists and pharmacy technicians, ensuring adequate timelines for implementing all changes, and setting expectations for pharmacy spaces commensurate with other healthcare providers and public health immunization clinics. In particular, special consideration should be given to the administration of vaccines to infants and children under 2, as some pharmacies may not be currently equipped to accommodate the unique requirements of young patients including space for parents accompanying infants and the additional time these vaccinations require.

Another recommendation is to take the opportunity to expand the scope of practice even further to allow pharmacists and technicians to offer the full spectrum of routine immunizations, to ensure Ontarians are able to catch up – and stay up to date – with their immunizations. This approach will generate significant savings in the health system both in terms of service costs to governments and physician time spent on routine vaccinations, freeing up physicians and nurses to tackle more challenging medical cases. With an estimated 2.4 million Ontarians¹ (especially school-aged children²) having missed at least one routine vaccination, the expanded scope would also provide a more accessible and convenient avenue for busy patients and their families to access routine immunizations (see chart below), closer to home and open outside of regular physician office hours. The province of British Columbia has had such a program in place since the fall of 2022, allowing pharmacists to administer all 13 of the key routine vaccines below, and providing remuneration for the administration of both publicly funded and non-publicly funded vaccines³.

¹ See NPAC (2021). National Poll Results of Routine Immunizations Released! Available from: <https://neighbourhoodpharmacies.ca/national-poll-results-routine-immunizations-released>

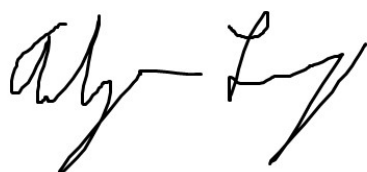
² See Public Health Ontario (2023). Surveillance Report: Immunization Coverage Report for School-Based Programs in Ontario: 2019-20, 2020-21 and 2021-22 School Years with Impact of Catch-up Programs. Available from: https://www.publichealthontario.ca/-/media/Documents/I/2023/immunization-coverage-2019-2022.pdf?rev=8c17516457604f77aff7e0321157e536&sc_lang=en

³ See "8.10 Pharmacist administration of drugs and vaccines" Available from: <https://www2.gov.bc.ca/gov/content/health/practitioner-professional-resources/pharmacare/pharmacare-publications/pharmacare-policy-manual-2012/pharmacyfees-subsidies-providerpayment/payment-for-pfv>

Vaccine Name	Brand Name(s)
Haemophilus b conjugate	Act-HIB [®]
Haemophilus influenzae type b conjugate	Hiberix [®]
Hepatitis A	Avaxim [™] , Avaxim [™] Pediatric, Havrix [®] 1440, Havrix [®] Junior 720, Vaqta [®] Adult, Vaqta [®] Pediatric
Hepatitis B	Engerix [®] B, Engerix [®] B Pediatric, Recombivax HB [®] , Recombivax HB [®] Adult Dialysis, Recombivax HB [®] Pediatric
Human papillomavirus (2 strains)	Cervarix [™]
Human papillomavirus (9 strains)	Gardasil [®] 9
Measles, mumps, rubella	MMR-II [™] , Priorix [™]
Measles, mumps, rubella, and varicella virus	Proquad [®] , Priorix-Tetra
Meningococcal group B	Bexsero
Meningococcal C conjugate	Meningitec [™] , Menjugate [®] , Neis Vac-C [®]
Pneumococcal conjugate 13-valent	Prevnar 13
Pneumococcal 23-valent	Pneumovax [®] 23
IPV (polio for travel indications)	Imovax [®] Polio
Quadrivalent meningococcal conjugate	Menveo, Menactra, Nimenrix [®]
Rabies	RabAvert [®]
Smallpox and Monkeypox	Imvamune [®]
Tetanus, diphtheria	Td Adsorbed
Tetanus, diphtheria, acellular pertussis	Adacel [®] , Boostrix [®]
Tetanus, diphtheria, acellular pertussis, polio adsorbed	Quadracel [®] , Adacel [®] Polio, Boostrix [®] -Polio
Tetanus, diphtheria, acellular pertussis, polio, hepatitis B, haemophilus influenzae type b adsorbed	Infanrix hexa [®]
Tetanus, diphtheria, IPV (polio for travel indications)	Td Polio Adsorbed
Varicella	Varilrix [®] , Varivax [®] III

Pharmacy is ready to help alleviate some of the pressures from the overburdened healthcare system, but it cannot do so without the support of the government of Ontario and the OCP. Pharmacists are a large and underleveraged resource of trained and registered professionals that can help alleviate the primary care pressures on the health system. They have proven themselves ready, willing, and able to take on the extremely challenging pandemic situation and help vaccinate the population as quickly and efficiently as possible – establishing pharmacies as the preferred vaccination destination for many Ontarians.

Sincerely,



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