

August 12, 2023

Ontario College of Pharmacists  
483 Huron Street  
Toronto, ON M5R 2R4

**Re: Expanded Scope Regulatory Amendments**

Dear Ontario College of Pharmacists (OCP),

Thank you for the opportunity to provide feedback on [proposed regulatory amendments](#) to expand the scope of pharmacists and pharmacy technicians to administer additional vaccines and offer treatment options for COVID-19 and influenza, for submission to the Ministry of Health.

The Ontario Chamber of Commerce (OCC) is the indispensable partner of business and Canada's largest, most influential provincial chamber. It is an independent, non-profit advocacy and member services organization representing a diverse network of 60,000 members. The OCC's mission is to convene, align, and advance the interests of its members through principled policy work, value-added business services, and broad engagement to drive competitiveness and economic growth in the province.

Ontario's health system continues to face significant strains, backlogs, and burnout, much of which was exposed and exacerbated by the pandemic. Of particular concern is the widening gap in access to primary care: currently, [2.2 million Ontarians](#) (nearly 15 per cent of the population) do not have a regular family doctor. This poses extreme short- and long-term risks to individual and population-level health, in addition to the capacity and sustainability of our health human resources and health system more broadly.

At the same time, our health system experienced additional pressure during the fall 2022 respiratory season, with the unprecedented "triple-demic" of influenza, COVID-19, and Respiratory Syncytial Virus (RSV). As we noted in our [joint letter](#) on addressing the backlog of routine immunizations, pharmacy professionals have played a key role in increasing access to COVID-19 vaccines across the province. In preparation for the upcoming respiratory season and beyond, it is critical that we leverage all available resources and infrastructure to protect the health of Ontarians, communities, businesses, and the economy, while ensuring the resilience of our health system.

To that end, we are writing to express our support for the OCP's proposed expanded scope regulatory amendments, which would help to:

- Improve access to vaccination through pharmacies, often located in and easily accessible through communities across the province.
- Maximize protection against RSV, COVID-19, pneumococcal disease, and influenza going into the 2023 respiratory season and beyond, helping to ensure Ontarians are healthier and able to participate more actively in the economy, from both a worker and caregiver perspective.
- Reduce the burden on family doctors to administer the RSV and other vaccines and provide treatment options for COVID-19 and influenza, allowing additional capacity for other primary care needs.

To promote continuity of care and guard against additional administrative burdens, it will be important for the proposed regulatory changes to ensure physicians remain informed about patient vaccination and treatment records.

In addition to this consultation's focus on the upcoming respiratory season, we encourage you to consider applying a broader lens to the expanded role that pharmacists can play to help bolster health system capacity and sustainability over both the short- and long-term, including through the following recommendations:

- Improve access to routine immunizations (e.g., human papillomavirus vaccine, hepatitis B vaccine, conjugated meningitis vaccine, shingles vaccine, etc.) by considering the role pharmacists can play in administering routine vaccinations.
- Continue to invest in a robust provincial clinical data management strategy for vaccination and other health records, including centralized data management, access to information for providers and patients, and business intelligence and data analytics to better understand trends and ensure continuous improvement of public health policies.

On the heels of [recent changes](#) expanding the scope of practice for pharmacists to treat and prescribe medications for common ailments, we hope the Government of Ontario will be open and receptive to these proposed regulatory changes. We appreciate the opportunity to provide feedback on this consultation and welcome the opportunity to discuss these comments further.

Sincerely,



Rocco Rossi  
*President and CEO*  
*Ontario Chamber of Commerce*