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August 10, 2023

Re: Expanded Scope Regulatory Amendments

Dear Ontario College of Pharmacists,

Thank you for the opportunity to provide feedback on the Expanded Scope Regulatory Amendments. At Sobeys National Pharmacy Group we encourage our pharmacists to practice at top of scope to ensure we can improve access to healthcare services for the public and are thrilled to see the proposed regulatory amendments.

The proposed changes are welcome and are important especially in the current environment of our healthcare system with significant shortages of primary care providers, a significant proportion of unattached patients and backlogs to providing care. Recognizing that the respiratory illness season is fast approaching, it is imperative that pharmacists and pharmacy technicians can participate to support improved access to patient care.

Anticipated respiratory illnesses (or any other suspected increase in illness) should not be the sole case to amend regulations. As new vaccines and other injectable substances come to market, a schedule of list of vaccines/substances that a pharmacist or pharmacy technician may administer creates barriers to increasing access to care. Regulations must be amended each time this occurs which may delay the ability for pharmacy professionals to support patient care in a timely manner. Secondly, as those who are authorized to administer vaccinations and medications already have training, they must practice within their competency and refer to an alternative healthcare provider when appropriate. We recommend that the College reconsider the requirement of a listed schedule for vaccinations and injectable substances and like many other provinces, enable pharmacists to practice top of scope and utilize their professional judgment within the scope of administering drug therapy. Like any prescription, a pharmacist should be able to assess the patient and utilize their professional judgment to identify whether the vaccination and/or substance is appropriate for the patient and therefore administer it accordingly. These changes would not only address potentially short-term crisis, but also provide access to patient care that would have a long-term positive impact on many Ontarians.

Again, we thank you for the opportunity to provide feedback and we are thrilled to see the practice of pharmacy progressing in Ontario. We look forward to future collaborative opportunities to continue to expand the scope of pharmacists.



Sincerely,

A handwritten signature in black ink, appearing to read "Pawandeep Sidhu".

Pawandeep Sidhu, BSc. Pharm.
Manager, Pharmacy Advocacy
Sobeys National Pharmacy Group