

May 27, 2016

Submit by email to [consultations@ocpinfo.com](mailto:consultations@ocpinfo.com)

Ontario College of Pharmacists  
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**RE: Open Consultation Feedback- Proposed amendments to the Pharmacy Act Regulations (Administration of Vaccines by Pharmacists)**

To Whom It May Concern:

Thank you for your consideration of our (Sobeys National Pharmacy Group) feedback on the proposed amendments to the Pharmacy Act Regulations, O. Reg. 202/94 General, with respect to the Administration of Vaccines by Pharmacists.

We agree that these proposed amendments support the Ministry of Health and Long-Term Care's promise to provide Ontarians with an improved healthcare experience. It is our view that enabling pharmacists to practice to their full expanded scope potential (including, but not limited to, the administration of vaccines) affords the public better access to timely, quality service that improves the delivery of cost-effective and clinically appropriate health care, thereby providing better health outcomes for all citizens.

While we support the proposed amendments for administration of vaccines by pharmacists, pharmacy interns and registered pharmacy students (subject to the terms, conditions and limitations imposed on his or her certificate of registration) presently under open consultation, we believe that this practice amendment should be expanded to include all vaccines and other medications administered by injection. Further, we believe that pharmacists should also have the ability to assess and prescribe for all vaccines, consistent with practice competencies. With respect to all vaccines listed in the publically funded immunization schedule, public funding for pharmacist administration of these vaccines is crucial to deliver on the Government's promise of better access to care and improved healthcare experience for Ontarians.

In addition, we advocate for the expansion of scope of registered pharmacy technicians to include the administration of vaccines and other injections (subject to training qualification and appropriate terms, conditions and limitations imposed on a certificate of registration) under the direct supervision of, and delegation by, an injection-certified pharmacist who has completed the necessary patient screening and assessment prior to the administration and is

available to attend to the patient in the event of injection emergency/complications. We believe this would further support access to an improved healthcare experience for Ontarians.

### **Administration of All Vaccines**

In the best interest of public health and safety, and consistent with the delivery of improved timely and convenient access to appropriate care, **the list of eligible vaccinations that can be administered by a pharmacist must be comprehensive and include all vaccines.** By providing from only a limited list of vaccines, pharmacists will be required to refer patients to another health care provider to receive other recommended vaccinations, thereby adding complexity to the patient care journey and decreasing the likelihood of patient adherence with recommended immunization schedules for multi-stage vaccinations, and in a way consistent with their preferred choice of health system access at the pharmacy.

Limitations to physician and other health care provider resources for routine vaccination (including access, convenience, timeliness, lost productivity, inefficiency for patients, added health system cost, and low vaccination rates) are already well known. Success with vaccination at the pharmacy by the pharmacist is also well established with the experience of Ontario's Universal Influenza Immunization Program as evidenced by a high degree of public acceptance with improved vaccination rates at the pharmacy.

Additionally, complicating factors can be reduced or eliminated by allowing for broad access to vaccination by the pharmacist at the pharmacy, including:

- Timely administration of vaccine by the pharmacist at the time of dispensing in the pharmacy eliminates the risk of vaccine wastage, suboptimal outcome, or patient safety concerns due to improperly stored vaccine during transit from the custody of the pharmacy to a second location (such as a physician's office) for injection.
- Live vaccines must be administered simultaneously or separated by 4 weeks. If a patient receives one live vaccine from their health care provider of choice (i.e. the pharmacist) and requires a vaccine absent from the current list under consideration for administration by a pharmacist (e.g. MMR), then the patient is at risk from a delay in or absence of, MMR protection- that could have easily been avoided. This example is especially pertinent in a case of need for last minute travel where protection with live vaccines such as Yellow Fever and MMR are essential.
- Comprehensive vaccination and follow-up services at the initial point of contact (i.e. the pharmacy) supports patient acceptance and vaccination uptake, reducing the risks and costs associated with suboptimal vaccination due to missed doses in a schedule or duplication of vaccinations from other health care providers resulting from incomplete records or other patient support factors.

- Avoiding delays in patient access and the additional work caused by the need to continuously review and make amendments to the list of vaccines allowed to be administered by pharmacists within the Pharmacy Act Regulations as new vaccines come to market.

### **Administration of Other Medications by Injection**

**Administration technique is the same for all IM/SC injections, and as such, pharmacists should be enabled to administer other medications by IM/SC injection** (such as Vitamin B12, Depo-Provera®, Methotrexate, Humira®, etc.) within the pharmacist's knowledge and competency. This is presently part of pharmacy practice in other jurisdictions in Canada, as well as under collaborative practice medical directives currently within Ontario. The pharmacist's ability to provide injection services for other medications beyond vaccines supports patient access to timely, quality care and improved efficiency for better health outcomes.

### **Assess and Prescribe for All Vaccines**

Aligned with the goal of providing improved timely and convenient access to appropriate care, **pharmacists should be supported with enabling legislation that permits them to assess and prescribe all vaccines consistent with practice competencies and Canadian Immunization Guidelines.** Patient assessment and prescribing of vaccines is a common barrier to access in our current healthcare environment and enabling the pharmacist, as the most accessible health care provider in our communities, to provide this service will improve the immunization status of Ontarians and contribute to better control of infectious disease and attendant risks and costs to the public and healthcare system.

### **Summary of Recommendations**

As the most accessible health care providers in our communities, pharmacists play an integral role in primary health care by delivering services within a scope of practice that supports and improves patient health outcomes. Intelligent design within a publically funded system with respect to immunization services would support the Ministry of Health and Long-Term Care's promise to provide Ontarians with an improved healthcare experience.

**To this end, we recommend, with respect to the proposed amendments to the Pharmacy Act Regulations (Administration of Vaccines by Pharmacists) that:**

- The list of eligible vaccinations that can be administered by a pharmacist must be comprehensive and include all vaccines.
- Pharmacists be supported with enabling legislation that permits them to assess and prescribe all vaccines consistent with practice competencies and Canadian Immunization Guidelines.

**Further, we recommend that:**

- As administration technique is the same for all IM/SC injections, pharmacists be enabled to administer other medications by IM/SC injection to further support patient access to an improved healthcare experience.
- The scope of practice of registered pharmacy technicians be expanded to include the administration of vaccines and other injections (subject to training qualification and appropriate terms, conditions and limitations imposed on a certificate of registration) under the direct supervision of, and delegation by, an injection-certified pharmacist who has completed the necessary patient screening and assessment prior to the administration and is available to attend to the patient in the event of injection emergency/complications.

We thank you for your consideration of our feedback on this matter and look forward to pharmacy practice amendments that progressively support the health and safety of all Ontarians.

Sincerely,



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Sr. Director Advocacy and Preferred Providers

Cc: William Redden, VP Pharmacy Policy and Programs  
Cc: Angie Wierzbicki, VP Pharmacy Operations (Ontario/West)  
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