



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

Ontario 2021 Budget Submission

Neighbourhood Pharmacy Association of Canada

February 12, 2021

Summary of Recommendations

RECOMMENDATION #1: Leverage pharmacy's existing robust pharmaceutical distribution system to distribute the COVID-19 vaccine.

RECOMMENDATION #2: Maximize the scale of Ontario's COVID-19 mass vaccination campaign by prioritizing pharmacists and pharmacy staff to receive the vaccine.

RECOMMENDATION #3: Offer pharmacists reasonable reimbursement of \$16.00 a dose for the COVID-19 vaccine, recognizing the complexity and costs to deliver the program.

RECOMMENDATION #4: Update the vaccine administration fee to \$13.50 to cover the actual costs to administer the vaccine.

RECOMMENDATION #5: Enable pharmacists to offer publicly funded routine vaccines by building on the success of the influenza program, streamlining the distribution of these vaccines through the pharmaceutical supply chain, and expanding access to publicly funded vaccines through community pharmacies. Remuneration should be \$13.50, consistent with Recommendation #4.

RECOMMENDATION #6: Further leverage pharmacists' ability to administer point of care tests for COVID-19 to help expand the province's testing and screening capacity using rapid tests in community pharmacies.

RECOMMENDATION #7: Enable pharmacist-administered point of care testing to support disease screening initiatives, chronic disease management, as well as by providing pharmacists with the ability to order and access lab tests.

RECOMMENDATION #8: Enact the proposed changes to scope of practice necessary to enable patients to see a trained pharmacist close to home for the assessment and, if necessary, treatment of common ailments and encourage adoption of the service by funding a \$20.00 assessment fee.

1. Introduction: A Race Against Time

We are at a critical juncture in the fight against COVID-19. With approved vaccines slowly deploying across Canada and additional vaccines working their way through trials and approvals, we see a light at the end of the very long tunnel we've been in. But with troubling new virus variants bringing the prospect of increased transmissibility and, most discouragingly, decreased vaccine effectiveness, it's clear that even with the end in sight, we're not nearly through this crisis yet.

There is promising evidence that the pandemic's second wave has peaked; daily cases are now declining and, hopefully, decreased deaths and hospitalizations will soon follow. But COVID-19 variants threaten a terrifying third wave that could overwhelm our hospitals, batter long-term care, and keep our people and economy in lockdown for months to come. They could complicate and prolong vaccine rollout, compounding recent supply disruptions.

We are in a race to vaccinate as many people as possible before dangerous new strains establish themselves. To win, we must leverage the expertise of every health professional and every point of care in every community across the province. There is no excuse for doing less than all we can.

Pharmacies have the capacity to vaccinate nearly 1 million Ontario patients a week. A successful mass vaccination campaign is unthinkable without pharmacy at its core.

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) represents Canada's leading pharmacy organizations, including chain, banner, long-term care, specialty pharmacies, and grocery chains and mass merchandisers with pharmacies. We aim to advance healthcare for Ontarians by leveraging over 4,600 community pharmacies conveniently located in neighbourhoods across the province. The economic footprint of the community pharmacy sector in Ontario is over \$6.3 billion and 94,200 jobs¹.

Ontario pharmacies stepped up during the pandemic. Designated an Essential Service, pharmacists and other pharmacy staff have taken risks to serve their patients and communities every single day. With so many businesses and care options made less accessible to slow the spread of this illness, pharmacy emerged – more than ever – as an essential link in our health system and central to keeping families, communities and our economy going.

But we know more can be done. Pharmacy is ready and willing to take on a stronger role to deliver better, more efficient care. Even before the current crisis, Ontario had set out on an ambitious course of health system transformation. Now we have a once-in-a-generation opportunity to create more seamless, convenient and connected care—change that puts the people of Ontario first.

¹ https://www.conferenceboard.ca/temp/3ecac3f7-7390-4253-8a94-6f3f8c84f9cf/9657_Pharmacist_Neighbourhood_ON_BR.pdf

2. Ending the Pandemic

Ontario is in the early stages of the largest and most complex vaccination campaign in its history. Defeating COVID-19 depends on its success. As noted above, threatening new variants threaten to complicate vaccine rollout – and could lead to a terrible third wave if we don't move fast enough.

The province cannot prevent disruptions to vaccine manufacturing or global supply chain. It can, however, implement a distribution plan that ensures as many Ontarians get vaccinated as quickly as possible with every available dose. That plan must include pharmacy as a primary channel as vaccines become more widely available, as it must be built around:

Access: Pharmacies are highly accessible, with close to 4,600 points of care in communities from the remote north to the heart of downtown Toronto. For many people they are the most convenient option, often offering extended hours beyond other primary care providers. That's one reason why Ontarians want and expect to get vaccinated at their local pharmacy. According to a recent Canadian Pharmacists Association and Abacus Data survey:²

- 58 per cent of Ontarians say they would get a COVID-19 vaccine at a pharmacy, and
- Nearly 80 per cent trust that their pharmacist is knowledgeable about vaccines, can safely administer vaccines and that pharmacies are a safe place to receive their vaccines.

RECOMMENDATION #1: Leverage pharmacy's existing robust pharmaceutical distribution system to distribute the COVID-19 vaccine.

Expertise: Both approved vaccines, and many prospective ones, require multiple doses. New virus variants may require administration of boosters to people already vaccinated. Pharmacists have established experience administering multi-dose vaccines and have been shown to increase immunization and adherence rates for shingles, HPV and hepatitis vaccines.^{3,4} Community pharmacists track, monitor and communicate with patients using refill interval functions in pharmacy management systems⁵.

Infrastructure: Pharmacies can meet storage and handling requirements, including complex cold chain storage. Every Ontario pharmacy surveyed by Neighbourhood Pharmacies has refrigerator capacity to support a COVID-19 vaccination campaign.⁶ They have what they need to conduct a mass vaccination campaign during a time of pandemic, as they did for seasonal influenza immunization this fall: personal protective equipment protocols and training,

² Canadian Pharmacists Association, Abacus Data. (2020). Pharmacists and COVID-19 Vaccinations in Canada. *Survey*. Retrieved December 8, 2020 from: https://www.pharmacists.ca/cpha-ca/function/utilities/pdf-server.cfm?thefile=/cpha-on-the-issues/CPhA_COVID_Vaccine_Report-Nov2020.pdf

³ Houle SKD, Eurich DT. (2019). Completion of multiple-dose travel vaccine series and the availability of pharmacist immunizers: A retrospective analysis of administrative data in Alberta, Canada. *PLoS One*, 14(1), e0211006.

⁴ Doucette, Kent, Seegmiller, McDonough, & Evans. (2019). Feasibility of a Coordinated Human Papillomavirus (HPV) Vaccination Program between a Medical Clinic and a Community Pharmacy. *Pharmacy*, 7(3), 91.

⁵ *Neighbourhood Pharmacies Survey Results*.

⁶ *Neighbourhood Pharmacies Survey Results*.

disinfection and cleaning procedures, appointment booking and COVID-19 screening processes, and adequate space for physical distancing.^{7,8}

As noted above, pharmacists can vaccinate nearly one million Ontarians a week without impacting regular dispensing and medication management services. Pharmacy can identify priority populations established through provincial frameworks based on age or other NACI recommendations and can administer the COVID-19 vaccine in environments outside community pharmacy like long-term care, retirement facilities, group homes, and workplaces.

This depends on government's support and appropriate investment to make a pharmacy-based campaign a success. Pharmacy must be at the heart of the vaccination program, with adequate doses allocated to the sector and clear communication about supply, so we don't run into the kinds of shortages experienced in the early weeks of the current flu season. Fees should incorporate the complexity and costs of delivering the program; educating patients to reduce vaccine hesitancy; prioritizing, triaging, and screening patients; follow-up and scheduling to ensure multi-dose adherence; and post-vaccine and adverse event monitoring and reporting. These two issues have been identified by our members as critical factors to the success of a mass COVID-19 immunization campaign in pharmacy.⁹

RECOMMENDATION #2: Maximize the scale of Ontario's COVID-19 mass vaccination campaign by prioritizing pharmacists and pharmacy staff to receive the vaccine.

RECOMMENDATION #3: Offer pharmacists reasonable reimbursement of \$16.00 a dose for the COVID-19 vaccine, recognizing the complexity and costs to deliver the program.

As noted above, pharmacy prepared for and invested in the protocols and procedures needed to safely administer influenza vaccines during the pandemic. Ontarians choose pharmacy in large numbers – more than 1.5 million received their flu shot in the pharmacy this past season. Unfortunately, the \$7.50 administration fee no longer reflects the actual cost to administer the vaccine. The fee has not been updated since 2013 and the cost to immunize Ontarians now exceeds the fee. As a result, less than 70% of Ontario pharmacies offer influenza immunizations compared to 95% in other provinces, such as BC and Alberta. Updating the fee could add an additional 1,100 potential vaccination sites and improve access to immunization services across the province.

RECOMMENDATION #4: Update the vaccine administration fee to \$13.50 to cover the actual costs to administer the vaccine.

⁷ *Neighbourhood Pharmacies Survey Results*. Assumes advance planning, an efficient distribution plan, and sufficient supplies of vaccine.

⁸ Canadian Pharmacists Association. (2020). Protecting the Front Line: Day to Day COVID-19 Questions. *COVID-19 Information for Pharmacists*. Retrieved December 8, 2020 from <https://www.pharmacists.ca/advocacy/covid-19-information-for-pharmacists/guidelines-for-protecting-the-front-line-covid-19-day-to-day-questions/>

⁹ *Neighbourhood Pharmacies Survey Results*.

3. Reducing Strain on Our Health System

The first and second waves of COVID-19 stressed Ontario's healthcare system. The risk of more transmissible virus variants threatens to stretch it even further. But there is an opportunity to leverage pharmacists' expertise and trusted relationships with their patients to reduce the burden on primary and acute care, reduce disruptions or delays to patient care, support public health units, and offer a more convenient option to millions of Ontarians.

Moreover, the proposed changes outlined below will benefit Ontarians long after COVID-19 has receded. This pandemic offers a mandate for generational change, building on the government's ambitious transformation agenda. Working together, let's build a health system that will deliver better quality care more efficiently and conveniently – and strong enough to withstand the next pandemic.

Protecting People Against Disease

Across Ontario, many Public Health Units are unable to offer routine vaccinations through schools in 2020-21.¹⁰ While students may receive these vaccines from their family physician or public health clinics, in many cases the capacity may not exist throughout the pandemic and these solutions may be impractical or inaccessible to many parents.

About half of all Canadians (48 per cent) indicated that they have postponed or decided not to go to the doctor's office or a walk-in clinic because of a COVID-19-related reason. Many (40 per cent) are concerned that their child may miss routine vaccinations as a result. Indeed, more than a third (34 per cent) of parents with kids 12 or younger have missed or postponed vaccinations due to COVID-19.¹¹

Pharmacists currently have scope of practice to administer most routine vaccines currently offered through public health, like human papillomavirus (HPV), and most of these vaccines can be administered without a prescription. However, pharmacists are barred from offering publicly-funded vaccines like HPV to their patients. This sets up a fundamental inequity. And this challenge exists not only for routine childhood immunizations like HPV, but also for adult immunizations such as the pneumonia and shingles vaccines, among others.

Pharmacies have robust vaccine supply chains in place and experience in managing vaccines and vaccination programs. Pharmacies have the infrastructure, and pharmacists can help clear the backlog of routine immunizations and fill the gap created by the suspension of school-based programs.

RECOMMENDATION #5: Enable pharmacists to offer publicly-funded routine vaccines by building on the success of the influenza program, streamlining the distribution of these vaccines through the pharmaceutical supply chain, and expanding access to publicly funded-vaccines through community pharmacies. Remuneration should be \$13.50, consistent with Recommendation #4.

¹⁰ <https://www.cbc.ca/news/canada/ottawa/hpv-vaccinations-cancelled-ontario-cancer-risk-pandemic-1.5757061>

¹¹ Polling conducted by Pollara Strategic Insights, August 11-16, 2020. Online survey conducted among a randomly selected sample of N=1,000 Canadians who are parents with at least n child aged 16 or under.

Helping Manage Chronic Illness

The Ontario government understands that widespread testing is vital to reopening Ontario's economy and schools and to bend the curve of this resurgent pandemic. Government also sees that community pharmacies are the health system's most convenient touchpoint for millions of Ontarians. That's why pharmacy has been empowered to offer COVID-19 testing to asymptomatic patients, in communities across the province. Pharmacies have played a significant role in making PCR testing more accessible to Ontarians with high levels of patient satisfaction. However, their accessibility, scope and expertise has not yet been leveraged to expand the use of rapid point of care tests such as rapid antigen tests. Pharmacies can be a key partner to the Ministries of Long-Term Care and Education as they actively seek ways to leverage rapid testing technologies to expand testing and screening capacity in schools, childcare centres and long-term care facilities. Engaging community pharmacies as an additional and needed resource to administer rapid antigen tests could provide an accessible and efficient opportunity for staff, volunteers and essential caregivers to visit their local pharmacy on their way to work or school to get tested. This approach could offer an efficient alternative to administering these tests on site and potentially increasing wait times or requiring staff to arrive to work early or wait in long lines to be tested before beginning their shift or workday.

It's time to take the next step to further reduce strain on primary and acute care and to benefit Ontarians beyond the current crisis. Pharmacists are the primary providers of medication management services. They are routinely consulted by patients and other healthcare providers for advice on medication dosing, effectiveness, and safety. Pharmacists have scope to renew and adapt chronic prescriptions but must rely on secondary sources of information to support this clinical decision-making. This makes it harder to provide effective care and is not in patients' best interest.

Enabling pharmacists to use point of care tests beyond those for COVID-19 – and ensuring they can access electronic health records and lab tests – would support better medication management and clinical decision-making, leading to a safer, more effective and efficient patient experience and better patient outcomes. Point of care test technology is advancing in tandem with pharmaceutical technology, for example, pharmacogenomic testing, and is becoming a more common adjunct to medication management.

Government is considering proposed regulatory changes brought forward by the Ontario College of Pharmacists to allow pharmacists to perform certain point of care tests for chronic disease management as a complementary and convenient track to laboratory monitoring. We encourage swift enactment of these proposed changes; we also propose broadening them to include point of care testing for screening and diagnosis, similar to what pharmacists are empowered to do for COVID-19, to further reduce lab backlog and to capture results in real time for government.

RECOMMENDATION #6: Further leverage pharmacists' ability to administer point of care tests for COVID-19 to help expand the province's testing and screening capacity using rapid tests in community pharmacies.

RECOMMENDATION #7: Enable pharmacist-administered point of care testing to support disease screening initiatives and chronic disease management, as well as by providing pharmacists with the ability to order and access lab tests.

Better Care, When Patients Need It, Where Patients Want It

Ontario is also considering potential scope of practice changes submitted by the Ontario College of Pharmacists at the request of the Minister of Health to allow pharmacists to assess and treat common ailments like insect bites, sprains and strains, allergies, and cold sores, among others. This would allow Ontarians to conveniently receive treatment and care in pharmacy and help reduce pressure on primary care. With many people reticent or unable to access primary care through the pandemic, this need is now greater than ever.

Despite knowledge of appropriate treatments and protocols from their intensive training, expertise and experience, pharmacists often feel helpless to provide simple care for patients, forced instead to refer them to another health professional. Not only is this inconvenient for patients, but it needlessly takes time away from physicians and other primary or emergency care providers, while increasing risk of COVID-19 exposure by requiring patients to travel to multiple sites to receive basic care.

Maximizing pharmacists' ability to deliver the care they have the training and expertise to provide will ensure patients can access high-quality care faster and bring better value to our health system. We urge government to move forward with the College's proposed changes and make the necessary investments to ensure pharmacists are fairly compensated for these services.

RECOMMENDATION #8: Enact the proposed changes to scope of practice necessary to enable patients to see a trained pharmacist close to home for the assessment and, if necessary, treatment of common ailments and encourage adoption of the service by funding a \$20.00 assessment fee.

4. Conclusion

It has been an enormously challenging year, but working together, the Ontario government and Ontario's pharmacies have helped manage the course of COVID-19 and avoid the worst scenarios envisioned at the beginning of this terrible pandemic. Now we are entering its final stage: a race against time to vaccinate as many people in Ontario as we can before new COVID-19 variants spread across the province and complicate our efforts to bring the pandemic to an end.

From the beginning, pharmacy has been at the forefront of the fight against COVID-19. We must likewise be at the heart of the effort to snuff it out. We can vaccinate close to one million Ontarians a week. That kind of capacity will be needed as the province undertakes what must be the biggest, fastest and most complex mass vaccination campaign in history.

At the same time, this pandemic offers a considerable opportunity to implement changes that will benefit people for years to come.

We can learn from the gaps in our health system that this crisis has exposed, and from the many swift, decisive actions government has taken in response. Together, we can build a future where, when a person is sick, they can access a variety of common diagnostic tests at their local pharmacy, without waiting for a doctor's appointment or going to the emergency room. Ontarians with mild illness and minor ailments could get an examination, diagnosis, and prescription at the pharmacy down the street – and return home with the treatment that will make them better. They can conveniently and safely access needed routine vaccinations. All of this will reduce the pressure placed on our family doctors and hospital emergency departments while maximizing healthcare investments.

We believe that with a collaborative approach that engages critical stakeholders and empowers health providers, we can end this pandemic, build the foundation for long-term improvements in our health system, and return to a path toward economic recovery and fiscal balance.