



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
de quartier**

365 Bloor Street East, Suite 2003  
Toronto, ON M4W 3L4  
T : 416.226.9100  
F : 416.226.9185  
info@neighbourhoodpharmacies.ca  
[neighbourhoodpharmacies.ca](http://neighbourhoodpharmacies.ca)

May 23, 2021

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

**Re: Neighbourhood Pharmacy Association of Canada submission on proposed Cross-Jurisdictional Pharmacy Services Policy**

To whom it may concern,

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates this opportunity to respond to the proposed Cross-Jurisdictional Pharmacy Services Policy that will clarify the responsibilities of pharmacists providing care to patients outside of Ontario.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations, including chain, banner, long-term care, specialty pharmacies, grocery chains, and mass merchandisers with pharmacies. We advocate for pharmacies' role in caring for Canadians, both behind and in front of the counter. We aim to advance sustainable healthcare for all stakeholders by leveraging close to 11,000 pharmacies conveniently located in virtually every community throughout the country – and over 4,500 community locations in Ontario.

**Proposed Policies and Recommendations**

The Cross-Jurisdictional Pharmacy Services policy will require pharmacists to interact with patients using some form of communication technology. This could be as simple as the telephone but may also include digital or virtual technology platforms that are becoming increasingly common. Therefore, the proposed Virtual Care Policy may also apply to these interactions. For greater clarity, we recommend that Cross-Jurisdictional Pharmacy Services Policy include a statement reminding registrants that the requirements of the Virtual Care Policy may also apply, especially those pertaining to informed consent and the protection of privacy and confidentiality.

When providing services to patients outside of Ontario, registrants should be required to inform patients that they are licensed to practice in the province of Ontario, prior to obtaining express informed consent. Furthermore, pharmacists should confirm the patient's ongoing drug plan

eligibility for the services to be provided, so that the patient understands the potential for out-of-pocket costs prior to obtaining informed consent.

### Conclusion

Neighbourhood Pharmacy Association of Canada is generally supportive of the proposed policy and recommends only a few changes to provide greater clarity.

1. Include a statement reminding registrants that the Virtual Care Policy may also apply.
2. Registrants should inform patients that they are licensed to practice in Ontario.
3. Registrants should confirm the patients drug plan eligibility.

Please do not hesitate to contact me at [shanna@neighbourhoodpharmacies.ca](mailto:shanna@neighbourhoodpharmacies.ca) should you have any questions, comments, or concerns.

Thank you,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a stylized flourish at the end.

Sandra Hanna, RPh  
Chief Executive Officer  
Neighbourhood Pharmacy Association of Canada