



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

Submission to the Standing Committee on Social Policy

May 14, 2021



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Summary of Recommendations

RECOMMENDATION #1: That government review current pharmacy reporting requirements to confirm the data infrastructure in place can be leveraged for the purposes of reporting the COVID-19 vaccine information required by this Act.

RECOMMENDATION #2: As the Act becomes operational, we urge the Minister not to issue any directive imposing additional, unnecessary reporting requirements on pharmacies; pharmacies are already reporting this data through multiple sources which are available to the Ministry of Health and it is imperative that pharmacies not become overburdened by administrative tasks while supporting vaccine rollout.

RECOMMENDATION #3: When the vaccine rollout and pandemic response have been successfully completed, revisit reporting requirements of pharmacies and pharmacists. To avoid duplication consider moving towards integrating the Health Network System, Ontario College of Pharmacists reporting system and COVax into one system accessible by all.

RECOMMENDATION #4: Ensure pharmacies are engaged and supported in any further changes relating to vaccine data collection and reporting.



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1. Introduction

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to comment on Bill 283, *Advancing Oversight and Planning in Ontario's Health System Act, 2021*. Of particular interest to our membership is Schedule 1, the proposed creation of the *Covid-19 Vaccination Reporting Act, 2021*. Our members – pharmacies across every corner of this province – appreciate the hard work done by this government to protect Ontarians during this challenging time. Pharmacy is proud to stand hand-in-hand with government and our partners across the health system on the frontlines of the fight against the novel coronavirus. We are eager to continue to work together to expand Ontario's vaccine rollout.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations that deliver high value, quality care to Canadians in all models including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative health care solutions. By leveraging over 11,000 points of care with pharmacies conveniently located in virtually every community across Canada, and over 4,500 within the province of Ontario, Neighbourhood Pharmacies aims to advance sustainable health care for all stakeholders.

Pharmacy continues to play a critical role in the COVID-19 vaccine rollout in Ontario. Since they began administering COVID-19 vaccines in March 2021, pharmacies across the province have administered almost 759,00 doses of the Pfizer-BioNTech, Moderna and AstraZeneca/COVIDSHIELD vaccines. As the supply of all vaccines increase in Ontario, and the opportunity for pharmacies to play a more substantial role grows, it is imperative that they have the dedicated time and resources to offer trusted advice and reliable care, and to safely administer vaccines.

Ontario's pharmacies support government's desired to collect information from patients and vaccinators. Tracking vaccination with strong data will be increasingly valuable, and vital, as the vaccine rollout continues – and particularly as we begin to administer second doses to millions of Ontarians. That is why pharmacy already reports robust information on its patients and vaccinations – including all of the information outlined in this proposed legislation.

As this legislation is operationalized, should it pass, it is important to avoid redundancy in data entered by pharmacists. Data collection is critical, but above all we want pharmacists and pharmacies, and all other vaccinators focused on immunizing as many people as quickly as possible. That is why we want to express our rationale for ensuring no additional administrative burdens are placed on pharmacy.

This submission offers recommendations as Ontario considers the operationalization of the *COVID-19 Vaccine Reporting Act, 2021*

2. COVID-19 Vaccine

We know that the rollout of the COVID-19 vaccine is crucial to ending the ongoing COVID-19 pandemic. For many Ontarians, local pharmacies are the preferred venue for receiving a range of common vaccines: 34% percent of Canadians receive their flu shot at their pharmacy (exceeding the 30% receiving the shot at their physician's office) with nearly 1.4 million doses administered through Ontario pharmacies in 2019-20. And pharmacists have already administered almost 759,000 doses of COVID vaccine in Ontario since March 2021.

Pharmacists' convenience and longitudinal relationships with patients allow them to provide education and awareness, increase vaccination rates, and support adherence through multiple touchpoints. For these reasons pharmacists are often the most accessible and trusted health providers for their patients.

In addition to the imperative resource pharmacists play in the lives of patients, they also have administrative responsibilities. This includes managing patient records. Over the years though patient records become increasingly complex, and to maintain the best patient records becomes a more arduous administrative task.

While this relationship between pharmacist and patient is a benefit of our health system, it does place an additional load on pharmacy and pharmacists. In a time of great pressure, like we are in now, to manage day-to-day relationships, be the trusted advisor, fill prescriptions, answer questions and offer solutions, is a significant undertaking. The safe and efficient vaccination of hundreds of thousands of Ontarians, the questions and concerns that arise from that service offering, administrative and reporting requirements associated with the vaccine's administration, and changes in staffing and accessibility due to COVID add to the pressures on pharmacies and pharmacists.

Pharmacies and pharmacists are eager to take on an even bigger role in the vaccine rollout – and this will be necessary to efficiently administer our growing vaccine supply – but the focus must remain on immunization, not burdening pharmacists with duplicative and unnecessary data reporting. Where data is already being reported, those existing reporting structures should be used and found to be compliant with the proposed legislation.

RECOMMENDATION #1: That government review current pharmacy reporting requirements to confirm the data infrastructure in place can be leveraged for the purposes of reporting the COVID-19 vaccine information required by this Act.

2. Pharmacy Vaccine Data Reporting

We understand that data is imperative to knowing who is being vaccinated, to inform vaccination delivery, to communicate better to all Ontarians, to ensure gaps in vaccine access are rectified, and to support an equitable and effective vaccine rollout. We agree with the intent of this Bill. However, we are concerned with the proposed authority of the Minister to “make directives in writing respecting the form, manner and timing of the disclosures...”

Pharmacies already have data systems recording all claims processed in the pharmacy. Currently, all drug claims are captured through these systems, including claims for the COVID-19 vaccine. The data standard being used for this is referred to in the industry as CPhAV3. In addition to standard reporting measures, pharmacy has also been required to implement new processes to enter all this

data into COVax. Of significant note, is that all fields proposed in this legislation are currently required to be reported in COVax, but while there is overlap, not all fields are in CPhAV3.

COVax is co-led by the Coalition for Epidemic Preparedness Innovations, Gavi and the World Health Organization, alongside key delivery partner UNICEF. Its aim is to accelerate the development and manufacture of COVID-19 vaccines, and to guarantee fair and equitable access for every country in the world.¹ To fulfill their mandate COVax requires a significant amount of the same information that pharmacy is already reporting through CPhAV3. However, rather than retrieving it from the original source, pharmacies are required to re-enter the data to the COVax system. This leaves pharmacy spending a great deal of time on redundant and duplicative administrative tasks.

A more appropriate approach starts by outlining the need to populate the clinical viewers directly through claim submission. Pharmacy claim submissions are done through the Health Network System (HNS). Currently, this requires duplicative administrative work. Pharmacy is required to submit claims through the HNS, and the Ontario College of Pharmacists (OCP) requires, through regulation and policy, that pharmacy also enter the information on the patient record.

The government needs to consider moving toward one integrated system. But in the short term, information can be populated through COVax. This the simplest place for pharmacy to populate additional details government wants because infrastructure already exists.

But the need to send additional information to the HNS through expansion of fields submitted on adjudication should be implemented. If this additional information were submitted through the HNS there would be no need to also enter this information into COVax, but all the data and information would be accessible across the entire system. A single system like this has been previously explored by government, and pharmacy, who were aligned. The suggested approach was to use the provincial provider registry Fast Healthcare Interoperability Resources (FHIR).

While this less duplicative, more efficient approach is being explored, and while the province is still so focused on getting COVID-19 vaccines into the arms of Ontarians, there would need to be some flexibility on the reporting regulations to accommodate changes and improvements to the system.

3. COVax and CPhAV3

These are all the data points this new legislation proposes to require:

1. Vaccinators – including pharmacists – will need to disclose to the Ministry of Health the following information about all patients...:

- a. Name(s) – legal, alternate, or alias
- b. Telephone number or email address
- c. Date of birth
- d. Gender
- e. Ontario health card number

2. Vaccinators will also need to disclose to the Ministry the following details of all COVID-19 doses administered:

- a. Product name and manufacturer
- b. Date of administration

¹ *Gavi The Vaccine Alliance*. COVAX, 2020, <https://www.gavi.org/covax-facility>. Accessed 7 May 2021.

- c. Lot number
- d. Expiry date
- e. Dose number for the individual to whom it was administered
- f. Responsible public health unit for the geographic area in which the dose was administered
- g. Anatomical location of injection
- h. Route of administration

3. Lastly, vaccinators will need to disclose to the Ministry the following information about themselves:

- a. Name
- b. Contact information
- c. Professional designation and license number

All of these data points, 1a-e, 2a-h, 3a-c, are captured in COVax and they are readily accessible from the client records within the store's Vaccination Event. For example, patient details are on the client record, and then specific dose files on the patient record would be accessed via the Dose Administration and Files sections. One additional note is that telephone and email address fields are not mandatory fields, but stores have been advised to include at least one of them as part of their training.

There are six points which are not part of the current claim standard. They are in the second category, details of the COVID-19 doses administered. They are lot number, expiry date, dose number for the individual to whom it was administered, responsible public health unit for the geographic area in which the dose was administered, anatomical location of injection, and route of administration.

The receipt pdf file of the vaccine administered contains five of these six additional reporting requirements. The only detail not reported directly is the public health unit (PHU) for the geographic area in which the dose was administered. But this information is still available. Details regarding the PHU are always visible in the system.

We would like to work with the government to leverage the digital infrastructure currently in place. As it stands now there is significant duplication of efforts. Requiring additional reporting will be an unnecessary red tape burden and, more importantly, take away time that pharmacy and pharmacists could be using to vaccinate more people.

RECOMMENDATION #2: As the Act becomes operational, we urge the Minister not to issue any directive imposing additional, unnecessary reporting requirements on pharmacies; pharmacies are already reporting this data through multiple sources which are available to the Ministry of Health and it is imperative that pharmacies not become overburdened by administrative tasks while supporting vaccine rollout.

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4. Conclusion

Pharmacists and pharmacies have clear mandates and requirements when it comes to reporting information about the patients they serve. The information sharing portion of a pharmacist's job is important – to ensure the patient is receiving the best possible care and to ensure that the government and appropriate agencies are aware of gaps, issues, or opportunities. There is no doubt that reporting patient data is a crucial part of pharmacy.

It is even more crucial that pharmacies are not being overburdened and tasked with duplicative efforts that take away from dedicated patient time: it is patient time, after all, that is pharmacists' most critical function.

We are encouraged by many of the actions the government has taken to date to fight COVID-19, and we are pleased to bring these further suggestions before the Standing Committee on Social Policy for consideration. We believe that with a collaborative approach that engages critical stakeholders we can offer the best support and help ensure more Ontarians are vaccinated in an efficient and effective manner.

About the Neighbourhood Pharmacy Association of Canada

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