



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

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October 16, 2021

Mr. Patrick Dicerni
Assistant Deputy Minister
Ontario Health Insurance Plan Division
438 University Ave, 4th Floor
Toronto ON M7A 1N3

RE: New regulation under the Laboratory and Specimen Collection Centre Licensing Act (LSCCLA)

Dear Mr. Dicerni,

The Neighbourhood Pharmacy Association of Canada (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. We aim to advance healthcare for Ontarians by leveraging over 4, 600 pharmacies conveniently located in virtually every community throughout the country as integral points of patient care. We are solutions-focused partners and want to work collaboratively to ensure pharmacies' role in caring for Canadians, both behind and in front of the counter, remains sustainable and competitive.

The COVID-19 pandemic disrupted many of the Government of Ontario's commitments to modernize and strengthen its health services. As the pandemic continues to evolve, we recognize that the province's efforts going forward must be focused on continuing to protect Ontarians from COVID-19 while simultaneously planning for health system and economic recovery. As such, we applaud the Ministry of Health's renewed efforts to modernize Ontario's laboratory sector by streamlining licensing and updating the regulatory framework. We are pleased to be contributing comments to this consultation process.

COVID-19 Sample Collection

In particular, we are delighted with the Ministry's continued recognition of the critical function community pharmacies play in supporting COVID-19 screening and identification. We welcome the opportunity to build on amendments already in place exempting pharmacists from the LSCCLA, which allow pharmacists to collect a sample and order a COVID-19 PCR lab test without the requirement to be a designated specimen collection site. Through this process, community pharmacies have played a significant role in making PCR testing more accessible to Ontarian. To date more than 1,000 pharmacies across the province have carried out over 900,000 assessments resulting in 610,000 PCR tests at participating laboratories.

As the pandemic evolves, the Province continues to look for ways to add capacity to the health system. The Ministry of Health has now asked community pharmacy sector to expand its COVID-19 testing activities, including ~~taking on~~ PCR sample collection from symptomatic

patients, providing access to self-collection kits and administering point-of-care PCR tests in selected regions. This signals a continued confidence in the pharmacy sector's ability to provide much-needed patient services in a convenient, accessible and safe manner. **As such, it is imperative that regulation under the LSCCLA continues to support community pharmacy's role in both collecting samples for and performing COVID-19 screening and diagnostic tests.**

Opportunity to Expand Pharmacy's Role in Point-of-Care and Laboratory Testing

This consultation also presents the Ministry with a renewed opportunity to examine other related regulatory changes that impact the scope, role and activities of regulated health professionals, and pave the way for better patient care. We understand the province is still considering proposed regulatory changes to allow pharmacists to perform certain point-of-care tests for the medication management of chronic diseases; and we've previously recommended additional changes to allow pharmacists to perform point of care testing for the purposes of disease assessment and screening. We continue to urge the swift enactment of these changes.

We further recommend that new streamlined regulation under the LSCCLA ensures that pharmacy professionals are enabled to collect specimen samples for **an expanded range of both point-of-care and laboratory tests** to support improved medication management, chronic disease management and screening to detect disease. Tests should include, but not be limited to

- Management of diabetes (e.g., blood glucose, Hemoglobin A1C)
- Management of dyslipidemia (e.g., lipids)
- Clotting disorders (e.g., Prothrombin time, INR)
- Acute infections (e.g., Strep throat, H. pylori)
- Chronic diseases (e.g., HIV, Hepatitis C)

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. Pharmacists are also well positioned to provide convenient and accessible testing that can facilitate early detection of certain conditions.

As technology evolves, additional modalities for testing will emerge. **Streamlined regulation enabling pharmacists to collect specimens for an expanded range of tests which can be analyzed at point-of-care or in a laboratory will ensure the most effective and timely use of results to support clinical decision making and access to care.**

Enablers to implementation

We urge the Ministry to continue to work to address barriers to pharmacy access to the Ontario Laboratories Information System (OLIS), clinical viewers and other centralized patient electronic health care records. Access to laboratory test results and other patient health information through these platforms will enable pharmacy professionals to make collaborative, informed decisions on patient care.

Finally, we remind the Ministry that appropriate remuneration is a crucial enabler. These services can be labour-intensive but also require significant investment in training, infrastructure, and resources to support their successful implementation. Fair funding for point-of-care testing and specimen collection to support lab-based testing is vital to successful implementation and uptake, which in turn is critical to realizing the broader health system benefits these proposed changes can deliver.

In Summary

1. We are extremely supportive of and commend the Province's efforts to streamline and modernize the regulatory framework of the LSCCLA, while simultaneously continuing to protect Ontarians from COVID-19 and plan for health system and economic recovery.
2. We remind the Ministry that the community pharmacy sector has excelled in supporting COVID-19 testing already enabled under the LSCCLA and can do more.
3. We strongly recommend that the Ministry:
 - ensures new regulation under the LSCCLA continues to support pharmacy's role in both collecting samples for and performing COVID-19 screening and diagnostic tests;
 - enables pharmacists to collect specimens for an expanded range of tests that support improved medication management and assessment of certain acute and chronic health conditions -- whether those specimens are analyzed at the point-of-care or sent on to a laboratory -- to ensure timely access to tests and results;
 - continues to advance community pharmacy's access to information systems and clinical viewers to improve patient-care decision making; and
 - considers fair remuneration for specimen collection and analysis services.

The Neighbourhood Pharmacy Association of Canada appreciates the opportunity to contribute feedback to this consultation. We are pleased to continue to collaborate with the province to further unlock community pharmacy's potential as a supporting partner in healthcare delivery.

Sincerely,



Sandra Hanna, RPh.
Chief Executive Officer

cc: Neeta Sarta, Director, Laboratories and Genetics, Ministry of Health
Angie Wong, Director, Drug Programs Policy and Strategy, Ministry of Health
Allison Henry, Director, Health Workforce Regulatory Oversight Branch, Ministry of

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Catherine Clasadonte, Policy Advisor, Ministry of Health

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