



September 25, 2023

Health Workforce Regulatory Oversight Branch  
Strategic Policy, Planning and French Language Services Division  
Ministry of Health  
Ministry of Long-Term Care  
438 University Avenue, 10th Floor  
Toronto ON M5G 2K8

**Re: Support of Proposed Regulatory Amendments to O. Reg. 202/94 (General) made under the Pharmacy Act, 1991**

---

Dear Members of the Health Workforce Regulatory Oversight Branch

The Canadian Society of Hospital Pharmacists – Ontario Branch (CSHP-OB) is pleased to express our support of the proposed regulatory amendments to O. Reg. 202/94 (General) under the *Pharmacy Act, 1991* posted on September 11<sup>th</sup>, 2023 (proposal number 23-HLTC051) to optimize the current scope of practice and support patients through the 2023/2024 respiratory season and beyond. As a national voluntary organization representing hospital pharmacists and pharmacy technicians, our society is steadfast in its commitment to high-quality patient care. These proposed regulatory changes align seamlessly with our mission and values.

Immunization is a key strategy to protect against vaccine-preventable diseases, leading to decreased associated morbidity, mortality, and healthcare costs. Over the past decade, pharmacists have become an integral part of the Ontario public immunization programs; hospital pharmacists were at the forefront of this during the COVID-19 pandemic, setting up the vaccine process from preparation, administration and documentation within the mass vaccination centres. The contribution of pharmacists and pharmacy technicians in administering COVID-19 vaccines during the pandemic is unequivocal. The proposed regulatory amendments to include more providers (e.g. pharmacy technicians) as well as vaccines (e.g. RSV vaccine and COVID-19 vaccine) as part of the scope of practice of pharmacy professionals promote the sustainability and access of Ontario's immunization programs, especially recognizing the recurring and seasonal nature of respiratory diseases.

The technique and skills required for intramuscular administration are applicable to all vaccines administered via this route; pharmacy professionals have also demonstrated their capability to safely administer COVID-19 vaccines to patients 6 months and older. These further support the proposed amendment to remove age restrictions for vaccine administration by pharmacy professionals.

The temporary authorization for pharmacists to prescribe nirmatrelvir/ritonavir (Paxlovid™) widened the access to antiviral treatment for COVID-19 during the pandemic for the public. This was an important step taken to not only divert system pressure from emergency rooms, but also leverage the skillsets of

pharmacists as medication experts and ensure timely initiation of therapy within 5 days of symptom onset to prevent hospitalization. Given the ongoing pressure from COVID-19, the transition of Paxlovid™ prescribing by pharmacists to the *Pharmacy Act, 1991*, is a logical next step. The same argument can be applied for the prescribing of oseltamivir for the treatment of influenza by pharmacists, where treatment benefits are obtained if the medication is started as early as possible after symptom onset<sup>1</sup>. The Association of Medical Microbiology and Infectious Diseases Canada suggested “starting treatment within 12 hours of illness onset should be a practical goal<sup>1</sup>.”

In the ever-evolving landscape of healthcare, it's imperative that regulations remain nimble and reflective of the current needs, challenges, and capabilities of the sector. The CSHP-OB appreciates the opportunity to comment on and demonstrate our support of the proposed regulatory amendments, which can improve Ontarians' population health, decrease public healthcare system pressure, and advance pharmacy professionals' scope of practice, if passed. At the same time, it is critical to also recognize other existing legislative barriers, such as the *Public Hospitals Act, 1990*, that limit the scope of practice for pharmacy professionals working in hospitals and other care settings governed by this act. Amendments to the *Public Hospitals Act, 1990* represent another major opportunity for change that can positively contribute to the healthcare of Ontarians.

We thank the Health Workforce Regulatory Oversight Branch for your continuous efforts in improving the healthcare landscape in Ontario and for considering our perspective on this crucial matter. For any further questions or clarifications, please feel free to contact me directly at [obpresident@cshp.ca](mailto:obpresident@cshp.ca).

Sincerely,

David Liu



President, CSHP-OB

1. Aoki FY, Allen UD, Mubareka S, Papenburg J, Stiver HG, Evans GA. Use of antiviral drugs for seasonal influenza: foundation document for practitioners—Update 2019. *J Assoc Med Microbiol Infect Dis Can.* 2019;4(2):60–82. <https://doi.org/10.3138/jammi.2019.02.08>