

Executive Officer Notice: Expansion of Specimen Collection for COVID-19 Testing of At-Risk Asymptomatic Persons through Ontario Pharmacies (Updated November 5, 2020)

November 5, 2020

This Executive Officer Notice and the accompanying Questions and Answers replace all prior communications from the Executive Officer respecting pharmacy services related to COVID-19 testing.

The Ontario government is increasing access to COVID-19 testing for at-risk or eligible asymptomatic persons in Ontario.

The Government of Ontario has made regulatory changes under the *Laboratory and Specimen Collection Centre Licensing Act* to:

- Permit pharmacists to order a polymerase chain reaction (PCR) COVID-19 test (previously only a physician or a nurse practitioner was allowed); and
- Exempt pharmacies from requiring a licence to collect a specimen for a PCR COVID-19 test.

Note: Regulatory changes under the *Laboratory and Specimen Collection Centre Licensing Act* enable pharmacists to collect specimens for the PCR COVID-19 test for the general public. Only pharmacists can order the test and collect the specimen, i.e., not pharmacy interns, students or registered pharmacy technicians.

Effective September 25, 2020, the Government of Ontario began funding certain pharmacies to conduct services relating to COVID-19 testing by appointment only. The purpose of this Notice is to provide information regarding pharmacy payment for these services. Please note that pharmacies **MUST** be registered as a participating pharmacy through the ministry to provide COVID-19 testing before claims can be submitted. Inappropriate claim submissions from non-registered pharmacies are subject to recovery.

For further information about the expansion of specimen collection for COVID-19 testing, please refer to the accompanying Questions and Answers (Qs and As) document.

For additional information related to COVID-19, please refer to the following ministry websites:

- [COVID-19 Provincial Testing Guidance](#)
- [COVID-19 Community Pharmacies](#)
- [COVID-19 Operational Requirements: Health Sector Restart documents](#)
- [COVID-19 Guidance: Testing of Asymptomatic Persons in Pharmacies](#) from Public Health Ontario

This notice and the accompanying Qs and As document constitute a Ministry policy that pharmacy operators must comply with when submitting claims for payment to the Ministry for services relating to COVID-19 testing. Compliance with all Ministry policies is required under section 3.2 of the Health Network System (HNS) Subscription Agreement for Pharmacy Operators.

Pharmacy and Patient Eligibility

As of **September 25, 2020**, *select* pharmacies are eligible to provide specimen collection for COVID-19 testing at no cost to eligible persons, if certain terms and conditions are met.

Patients are eligible for testing in pharmacies if they are asymptomatic for COVID-19 (i.e. not showing symptoms) and fall under one of the following categories:

1. Eligible for testing as part of a targeted testing initiative as determined by the Ministry of Health or Ministry of Long-term Care or public health. This includes:
 - a. residents, workers or visitors in long-term care homes
 - b. residents or workers in homeless shelters or other congregate settings
 - c. international students who have passed their 14-day quarantine period
 - d. farm workers
 - e. individuals who self-identify as Indigenous.
2. Require a COVID-19 test for international travel clearance purposes.

Patients who reside or work in a long-term care home or homeless shelter not currently in an outbreak may be directed to pharmacies for COVID-19 testing as part of their routine surveillance activities. These patients will be identified during pharmacy screening calls and should be reminded to bring their assigned investigation number with them when attending their appointment for COVID-19 testing at the pharmacy.

Eligibility includes individuals who are eligible ODB recipients and non-ODB recipients and those without Ontario health card numbers.

No eligible person will be charged for a COVID-19 test at a pharmacy, even if they do not have an Ontario health card.

Prerequisites for Providing COVID-19 Test

Pharmacist training and guidance:

- Pharmacists should be familiar with specimen collection for COVID-19 testing. Resources for pharmacist training include:
 - An online education module developed by the Ontario Pharmacists Association (OPA) and available on [their website](#).
 - Other resources available to pharmacists, including the [Public Health Ontario \(PHO\) website](#).
 - [Ontario College of Pharmacists \(OCP\) Guidance](#) document
 - Other COVID-19 related resources also available on the [OCP website](#)

Obtaining COVID-19 test kits:

- Pharmacies can order COVID-19 test kits through the following website at no cost: <https://ehealthontario.on.ca/en/health-care-professionals/digital-health-services>.
- Pharmacies that belong to a banner or chain corporation should work through their corporate head office, who may centrally coordinate order and facilitate distribution.
- Independent pharmacies may order kits directly from the website.

Pharmacy Billing Procedure

- The pharmacist who collects the COVID-19 specimen must be identified in the prescriber field on the claim submitted for payment through the HNS using the PINs identified below. Only pharmacists are allowed to collect specimens for COVID-19 testing.
- Pharmacists must ensure that the patient's name, date of birth and Ontario health card number are entered accurately as part of the HNS claims submission.
- For patients without a health card number, pharmacies can use the proxy patient ID: 79999 999 93 (see below for further details).
- Certain pharmacy services relating to COVID-19 testing are eligible for payment through the HNS by the Ontario government. The PINs listed in Table 1 below describe the services that are eligible for payment.

Table 1: PINs to support payment of services relating to COVID-19 Testing

PIN	Description	Total Amount Paid
09858124	<p>Assessment Fee for COVID-19 Test (amount paid for screening the individual for symptoms of COVID-19* to determine if they are eligible for specimen collection)</p> <p>The specimen collection service cannot be conducted without an in-pharmacy assessment. However, pharmacies may utilize pre-screening assessments virtually when booking appointments for the in-pharmacy assessment and specimen collection.</p> <p>Note:</p> <ul style="list-style-type: none"> • Only one (1) screening assessment can be billed per eligible person per prospective specimen collection • If a pharmacy conducts a pre-screen virtually and concludes that the patient is <i>not</i> eligible for the specimen collection (e.g. because they are symptomatic or not part of the at-risk targeted population), then the PIN may be billed for this service. • If a pharmacy conducts a pre-screen virtually and concludes that the patient is eligible for the in-pharmacy specimen collection, then the PIN cannot be billed until the in-pharmacy screening assessment takes place. • If the pharmacy does not utilize pre-screening assessments virtually, then the PIN can only be billed when the in-pharmacy screening assessment takes place. • Please refer to the Questions and Answers document for more information about these billing rules. 	\$20.00
09858125	<p>Specimen Collection Fee for COVID-19 Test (amount paid includes collection of the specimen through an anterior nasal or throat¹ swab and reimbursement for any privately purchased personal protective equipment used by the pharmacy).</p> <p>The service includes completion of the COVID-19 test requisition form, collection of the specimen, notification of results and documentation requirements.</p>	\$22.00

¹ Note that the current laboratory for specimen collection from pharmacies can ONLY accept anterior nasal swabs.

PIN	Description	Total Amount Paid
	<p>Note:</p> <ul style="list-style-type: none"> • Only one (1) specimen collection fee per day for an eligible person. • Specimen collection is the same day as the Assessment. • In using this PIN, the pharmacist must have submitted a corresponding claim with PIN 09858124 (Assessment for the COVID-19 test) for the same patient. 	
09858126	<p>Transportation Fee (COVID-19 Specimen) (amount paid includes the daily transportation of the specimens from the pharmacy to the designated laboratory including the costs of shipping materials, up to a maximum of \$140 per store per day).</p> <p>Note:</p> <ul style="list-style-type: none"> • Only actual daily transportation costs (including shipping materials) may be submitted, up to \$140 per day per store. • Do not submit a claim for the Transportation Fee under a patient's name. Pharmacists must use the Proxy patient ID 79999 999 93 in place of the health card number. • Pharmacies are responsible for arranging their own transportation to the designated laboratory. Pharmacies are encouraged to exercise fiscal responsibility when determining transportation and packaging arrangements. 	Up to \$140.00

Claims must be submitted using the ministry-assigned PIN associated with the COVID-19 testing service provided. Claims must be billed using the service date.

*Note: Only asymptomatic individuals can be tested for COVID-19 at a pharmacy. If a person screens positive, they must be directed to a COVID-19 Assessment Centre or emergency department. No Specimen Collection Fee (\$22) can be claimed for symptomatic individuals.

In accordance with Table 1, a PIN is required for all claims.

For the **Assessment Fee** (PIN 09858124) or **Specimen Collection Fee** (PIN 09858125) for **ODB-eligible** recipients:

The claim submission** follows the normal process for submitting claims for ODB-eligible recipients (using their Ontario health card number or other ODB eligibility number for some recipients) on the HNS with the following additional information:

- Intervention code 'PS': (Professional Care Services)
- Valid Pharmacist ID
- Professional Fee: see table above for the "Total Amount Paid" for each PIN

**Note: At least three patient identifiers must be included on the specimen label (e.g., patient name, date of birth, health card number, postal code or gender).

For the **Assessment Fee** (PIN 09858124) or **Specimen Collection Fee** (PIN 09858125) for **Non-ODB eligible** recipients **WITH** an Ontario health card number:

When submitting a claim** for a person who does not have ODB coverage, pharmacists must submit the following information:

- Patient Gender: 'F' = female; 'M' = male
- Patient Date of Birth: Valid YYYYMMDD
- Patient's Ontario health card number
- Intervention codes:
 - PS: Professional Care Services
 - ML: Established eligibility coverage (i.e., 1 day of the Plan 'S' coverage)
- Carrier ID: 'S'
- Valid Pharmacist ID
- Professional Fee: see table above for the "Total Amount Paid" for each PIN

**Note: At least three patient identifiers must be included on the specimen label (e.g., patient name, date of birth, health card number, postal code or gender).

For the **Assessment Fee** (PIN 09858124) or **Specimen Collection Fee** (PIN 09858125) for **Non-ODB eligible** recipients **WITHOUT** an Ontario health card number:

When submitting a claim** for any eligible person who does **not** have an Ontario health card number, pharmacists must submit the following information:

- First Name: Patient's first name
- Last Name: Patient's last name
- Patient Gender: 'F' = female; 'M' = male
- Patient Date of Birth: Valid YYYYMMDD
- Proxy patient ID: 79999 999 93
- Intervention codes:
 - PS: Professional Care Services
 - PB: Name entered is consistent with card
- Valid Pharmacist ID

- Maximum Reimbursement Amount: see table above for the “Total Amount Paid” for each PIN

****Note:** At least three patient identifiers must be included on the specimen label (e.g., patient name, date of birth, health card number, postal code or gender).

For the **Transportation Fee** (for all patients):

When submitting a claim for the Transportation Fee, pharmacists must submit the following information:

- First Name: Transport
- Last Name: Fee
- Patient Gender: Leave blank or enter “U” (unknown)
- Patient Date of Birth: Leave blank or enter 20000101
- Proxy patient ID: 79999 999 93
- Intervention codes:
 - PS: Professional Care Services
 - PB: Name entered is consistent with card
- Valid Pharmacist ID
- Enter PIN: 09858126
- Professional Fee: Actual transportation costs (including shipping materials) – up to \$140 per day.

Note: Do not submit a claim for the Transportation Fee using a patient’s Health card number. Only the above proxy patient ID can be used.

Restrictions

- For the **Assessment Fee** (PIN 09858124), a maximum of one screening assessment per patient per day
- For the **Specimen Collection Fee** (PIN 09858125), a maximum of one specimen collection per patient per day
 - The pharmacist must have submitted a corresponding claim with PIN 09858124 (Assessment for the COVID-19 test) for the same patient.
- For the **Transportation Fee** (PIN 09858126), a maximum of one (1) claim per day per store based on actual daily transportation costs, up to a maximum of \$140.

Pharmacy Record Requirements

For purposes of post-payment verification, pharmacy records related to claims for COVID-19 testing must be maintained in a readily available format for the purpose of ministry

inspection for a minimum of 2 years. Overpayments due to inappropriate claim submissions are subject to recovery.

Pharmacists shall keep records consistent with their obligations under the *Pharmacy Act, 1991*, the *Drug and Pharmacies Regulation Act* and any instructions or guidelines provided by the Ontario College of Pharmacists (OCP) or the ministry.

Under this ministry policy, the records that must be maintained include, at a minimum:

- To support claims for the **Assessment Fee** for the COVID-19 Test, a copy of the screening form used is acceptable which would include:
 - Documentation of agreement by the patient for the assessment (e.g., patient signature or verbal consent) and rationale for recommending the test (or not), at the pharmacy.
 - Patient identifiers including: patient name, date of birth, address, phone, Ontario health card #
 - The date and time of the Assessment.
 - The name of the family physician/nurse practitioner if provided.
 - A summary of the result of the patient assessment, including the recommendation (i.e., include rationale if the patient is ineligible for a test).
 - The name of the pharmacist providing the service.

- To support claims for the **Specimen Collection Fee**, pharmacists must provide an indication that the test was administered according to the program protocols established by the Ministry and in accordance with OCP policy as in the following list:
 - Patient screened as Asymptomatic
 - Lab Requisition for COVID-19 Swab Sample completed.
 - Environmental controls and infection control protocols were in place prior to testing.
 - PPE donned (e.g., surgical mask (i.e., medical mask), gloves, face shield/goggles, gown) according to guidelines.
 - Swab and Test kit prepared and ready for sample collection.
 - Patient informed of sample collection procedure, experience and potential discomfort.
 - Anterior nasal or throat swab collected as per Public Health Ontario Guidance.
 - Sample placed in collection media as per Public Health Ontario Guidance.
 - Sample packaged and labelled with patient information and requisition completed as per Public Health Ontario Guidance.
 - Results notification reviewed with patient and contact information confirmed.
 - Collected samples stored as per Public Health Ontario Guidance and readied for return to lab collection centre.
 - Environmental controls and infection control protocols and PPE doffing completed AFTER sample collection completed and patient released.
 - The name of the pharmacist administering the test

- Invoices for specimen collection kit and tracking of specimen collection (if available)
- Copy of the COVID-19 Test results

The signature of the pharmacist who administered the test along with a copy of the completed requisition form and a copy of the results with documentation that they were communicated to the patient if positive and/or if the patient was unable to access the results online must be part of the documentation for claim submission.

- To support claims for the **Transportation Fee**:
 - Proof of transport of the collected specimens to the designated lab (e.g., shipping invoice with details of date/time shipped, by whom, number of tests collected, etc.) and proof of transportation costs (i.e. costs of shipping and shipping materials). Note: Claim amounts must correspond to amounts on the invoices.

Reimbursement for Additional Transportation Costs Incurred by Pharmacies between September 25, 2020 and November 4, 2020

The ministry will reimburse pharmacies for **additional** costs they have incurred that exceed the previous \$20 transportation fee limit (per store per day) for transporting specimens from pharmacies to the designated laboratory (including shipping materials) from September 25th, 2020 to November 4, 2020.

The ministry will provide detailed information on how to submit reimbursement claims for payment.

Additional Information:

For pharmacies:

For billing inquiries, please call ODB Pharmacy Help Desk at: 1-800-668-6641

For all other Health Care Providers and the Public:

Please call ServiceOntario, Infoline at 1-866-532-3161 TTY 1-800-387-5559. In Toronto, TTY 416-327-4282