

Questions and Answers for Pharmacists: Expansion of Specimen Collection for COVID-19 Testing of At-Risk Asymptomatic Persons through Ontario Pharmacies – Updated November 5, 2020

This Questions and Answers document accompanies the Executive Officer (EO) Notice on the Expansion of Specimen Collection for COVID-19 Testing of At-Risk Asymptomatic Persons through Ontario Pharmacies.

The information that follows is to help pharmacies that provide this specimen collection service.

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 COVID-19 test.

Effective September 25, 2020, the Government of Ontario began funding certain pharmacies to conduct certain services relating to COVID-19 testing.

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

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

These Qs and As and the accompanying [EO Notice](#) constitute a Ministry policy that pharmacy operators must comply with when submitting claims for payment to the Ministry respecting services related 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.

Overview

1. When are participating pharmacies able to receive payment for specimen collection for COVID-19 testing for asymptomatic persons?

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 (see Q5 for eligibility).

2. Where can we find the locations of the participating pharmacies?

Participating pharmacies are included in the [online Ontario assessment centre location finder](#) to support patients in finding a convenient location to obtain a COVID-19 test. The finder will continue to be updated as additional pharmacies rollout.

3. Is testing at pharmacies available by walk-in or appointment?

Testing at pharmacies is available by appointment only. Visit the [online Ontario assessment centre location finder](#) to find your local pharmacy and make an appointment.

4. Why were only some regions chosen for pharmacy testing?

Testing sites are being prioritized in regions that are experiencing the greatest number of COVID-19 cases and need for additional testing capacity. Recognizing that there is a need for more testing sites, continued rollout to pharmacies across the province will follow. Interested pharmacies should contact the Ontario Pharmacists Association (OPA) and the Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) for more information about becoming a testing site. We look forward to growing the number of pharmacies that provide testing as they become available.

Patient Eligibility

5. Who is eligible for Specimen Collection for COVID-19 testing at pharmacies?

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. If the patient does not know their investigation number, leave the area blank on the requisition form and ask that they confirm with the long-term care home or shelter.

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.

Pharmacy Eligibility

6. How can pharmacies participate?

Pharmacies interested in providing COVID-19 testing should contact the Ontario Pharmacist Association (OPA) or the Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) for more information about becoming a testing site. 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.

7. What do I do before proceeding with the Specimen Collection for COVID-19 Testing and billing the ministry through the HNS?

Pharmacies should ensure they have read and followed the [guidelines](#):

- [COVID-19 Guidance: Testing of Asymptomatic Persons in Pharmacies](#) from Public Health Ontario
- Ontario College of Pharmacists (OCP) Guidance document: [COVID-19 Testing of Asymptomatic Persons in Community Pharmacies](#)

Only participating pharmacies that comply with the requirements of the ministry policy set out in this [Executive Officer's Notice](#) and this Qs and As document dated **November 5th, 2020**, will be able to receive payment for the services relating to COVID-19 testing described in Q5.

8. What training will be provided to pharmacists to perform the COVID-19 test?

Pharmacists are encouraged to be familiar with the procedure of 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 [COVID-19 Testing of Asymptomatic Persons in Community Pharmacies](#)
- Other COVID-19 related resources also available on the [OCP website](#).

It is the professional responsibility of every pharmacist to ensure that he or she has the appropriate training on specimen collection and sufficient knowledge to competently collect the specimen.

9. Do pharmacists have the appropriate scope of practice to collect COVID-19 specimen from patients?

Pharmacists are performing specimen collection using a Public Health Ontario validated specimen collection method that is not a controlled act under the *Regulated Health Professions Act, 1991*, such as an anterior nasal swab or throat swab*. The anterior nasal swab occurs within 1 centimeter of the nostrils.

*Note: At this time, pharmacists can only collect specimens for COVID-19 testing that the designated laboratory can process. Currently, pharmacies can only order specific kits from the Ontario Health website that are appropriate for anterior nasal swabbing.

Regulatory changes under the *Laboratory and Specimen Collection Centre Licensing Act* enable pharmacists to collect specimens for the polymerase chain reaction (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.

The specimens that pharmacists collect will be routed and transported to the designated laboratory in the Provincial Laboratory Network for COVID-19 testing.

10. What protocols or requirements must be in place before a pharmacy can provide COVID-19 testing?

All specimen collection centres, including pharmacies, are expected to implement and follow general infection and prevention control measures to help protect their staff, patients, and customers against COVID-19. Appropriate personal protective equipment (PPE) must also be worn. For more information, please visit the ministry's website on COVID-19 Guidance for the Health Sector and review [COVID-19 Guidance: Testing of Asymptomatic Persons in Pharmacies](#) from Public Health Ontario. Pharmacies must also meet OCP's guidance and standards and code of ethics requirements.

11. Can a pharmacy technician or other pharmacy staff do the pre-screen assessment?

Pre-screening could potentially be completed by another pharmacy staff member. However, the pharmacist will be responsible for ensuring that the information collected is accurate and complete. Documentation requirements must be met before a claim for payment is submitted.

Please note: Only pharmacists can order the laboratory test and collect the specimen, i.e., not pharmacy interns, students or (registered) pharmacy technicians.

12. How many tests can a pharmacy do per day?

The number for tests that pharmacies may complete per day is dependent on when the pharmacy started offering tests.

Pharmacies that began testing before October 12, 2020 may perform up to 50 tests per day.

For new stores onboarding as of October 13, 2020, pharmacies should be limiting to a maximum of 20 tests per day. As the Ministry confirms that new stores are collecting and submitting specimens correctly and lab capacity allows, the Ministry will advise of new limits.

Claims for payment through HNS and Ministry payment

13. What information on payment for specimen collection is available for pharmacists?

The Product Identification Numbers (PINs) listed in the table is to be used for all Ontarians, regardless of eligibility for the Ontario Drug Benefit (ODB) Program.

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 	\$20.00

PIN	Description	Total Amount Paid
	<p>symptomatic or not part of the at-risk targeted population), then the PIN may be billed for this service.</p> <ul style="list-style-type: none"> • 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. 	
09858125	<p>Specimen Collection Fee for COVID-19 test (amount paid includes collection of the specimen through an anterior nasal or throat swab¹ 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> <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. 	\$22.00
09858126	<p>Transportation Fee (COVID-19 Specimen) (amount paid includes transporting 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>	Up to \$140.00

PIN	Description	Total Amount Paid
	<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 arrangements. 	

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

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.

14. How are claims for services relating to COVID-19 testing submitted through the HNS?

HNS claims for pharmacy services relating to COVID-19 testing must contain the appropriate PINs when an eligible person receives the service at the pharmacy. See Q13, including the table provided.

Pharmacists must ensure the patient's correct date of birth, Ontario health card number and name (as it appears on the health card) are entered accurately as part of the HNS claim submission. For individuals **without** a health card number, use the proxy ID # 79999 999 93. Please refer to the [EO Notice](#) dated November 5th, 2020 for further details.

15. What is the procedure to submit the claim to the HNS for services relating to COVID-19 testing?

The claim submission follows the normal process for submitting claims on the HNS.

16. How does the ministry pay for a claim to a pharmacy for services relating to COVID-19

The payment is paid through the ministry's HNS to the accredited pharmacy that has a billing account with the ministry.

17. Can I submit manual (paper) claims for services relating to COVID-19 testing?

Paper claims will not be accepted. Claims must be submitted online to the HNS only.

18. When does the pharmacist submit the claim for payment for the service relating to COVID-19 testing?

Pharmacists must submit the claim on the same day that the service was provided.

Documentation and Record Keeping

19. What documentation is required to accompany the specimen to the lab?

COVID-19 specimens should be accompanied by a complete version of the [COVID-19 virus test requisition form](#) or through established submission protocols, provided the same information is collected as presented in the requisition form.

For laboratories to successfully submit results to Ontario Laboratories Information System (OLIS) and thus make them accessible on the patient viewer (required fields outlined below and at end of this guidance), the following key elements are required on the COVID-19 requisition form:

- Health card number
- Date of Birth
- First Name
- Last Name
- Sex
- Address

Please ensure that the information on the form is **complete and legible**. Please refer to the *Asymptomatic PCR COVID-19 Testing Resource for Pharmacy* document distributed to your store for further information.

For patients identified during pre-screening calls as residents and workers of long-term care homes or homeless shelters, pharmacists should remind patients to bring their assigned investigation number with them when attending their appointment for COVID-19 testing at the pharmacy. The investigation number will be required on the requisition form. If the patient does not know their investigation number, leave the area blank on the requisition form and ask that they confirm with the long-term care home or shelter.

20. What is the pharmacist required to document when providing services relating to COVID-19 testing to eligible Ontarians?

Under this ministry policy, the records must 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 should correspond to amounts on the invoices.

21. How long should the record be kept for billing purposes?

Pharmacy documentation must be maintained in a readily available format for the purpose of the ministry audit for a minimum of 2 years. Overpayments due to inappropriate claim submissions are subject to recovery.

Pharmacists should ensure all documentation is also retained in accordance with the *Pharmacy Act, 1991, Drug and Pharmacies Regulation Act*, and the Ontario College of Pharmacists policies and guidelines, such as the Record Retention, Disclosure and Disposal Guideline and Documentation Guideline.

Transportation Information

22. What does the Transportation Fee include?

The Transportation Fee provides reimbursement for the actual shipping costs incurred including shipping materials (e.g., Styrofoam coolers, ice packs, etc.) for transporting the COVID-19 swab specimens from the pharmacy to the designated laboratory as identified in Q27. Pharmacies must only submit claim amounts equal to their actual daily transportation costs, up to \$140 per day. If your transportation costs are less than \$140 per day, you must submit your actual costs and CANNOT submit \$140.

23. The courier that I use for transporting the specimens invoices the pharmacy weekly. How should I submit the claim for transportation costs?

Pharmacies need to submit the claim for the Transportation Fee on the same day as the transportation. Regardless of invoice scheduling, pharmacies should be able to calculate the transportation cost on the days that shipping occurs. Invoices should be itemized to account for *daily* transportation.

24. Can I make more than one delivery to the designated laboratory per day?

A pharmacy may choose to make more than one specimen delivery per day; however, the Transportation Fee PIN may only be submitted once per day with the actual transportation cost per day, not *exceeding* a total of \$140.

25. What are the shipping requirements for COVID-19 Specimens in Ontario?

Collected specimens should be shipped to the lab the same day they are collected if possible, to ensure specimen integrity and a timely public health response in the case of a positive COVID-19 result. Table 1 (below) outlines the recommended storage and shipping requirements to preserve the integrity of the specimens collected.

Table 1. Storage and Shipping Requirements

Specimen type	Temperature for storage until shipment	Expected duration of shipment	Recommended shipment temperature	Shipment Category
Anterior Nasal swab	2–8 °C	≤ 72 hours	2–8 °C (ice pack)	Package and ship clinical specimens in accordance with the Transportation of Dangerous Goods Regulations.
		> 72 hours	–70 °C (dry ice)	

Couriers are not required to use refrigerated trucks for shipping as long as specimens are transported in a cooler with an ice pack. While specimens should be maintained at 2-8°C following specimen collection (i.e. in the pharmacy), pharmacies are not required to ensure that this exact temperature is maintained during shipping. To keep specimens cool, they should be transported in a rigid container (e.g. Styrofoam cooler) with an ice pack. If specimens will not be shipped within 72 hours, specimens will be required to be frozen and kept frozen during transport.

Specimens should be packaged and shipped in accordance with the Transportation of Dangerous Goods Regulations under the *Transportation of Dangerous Goods Act, 1992*. For more information, please visit [Transport Canada's Transportation of Dangerous Goods Guidelines](#) or connect with a transportation of dangerous goods training provider.

26. What are the preparations required prior to transport?

The following is a list of useful tips for preparing specimens for transport:

- Place PCR COVID-19 specimens in sealed biohazard bags and include the requisition in the outer pouches. The requisition should not be in contact with the specimen.
- Place the individual biohazard bags together in sealed large plastic bags, along with some absorbent material (e.g., paper towels).
- Place the large plastic bags into a rigid outer shipping container (such as a Styrofoam cooler) with one ice pack.
- Address and label the container with “**UN3373**” and “**COVID-19 specimens.**”

27. Where should specimens be dropped off?

The current designated laboratory for specimen collection drop-off is:

In-Common Laboratories
57 Gervais Drive
North York, ON, M3C 1Z2

Deliveries can be made between 7 am to 10 pm (these hours may be expanded in time).

28. What courier service should I use? Can I drop off the specimens myself?

Pharmacies must arrange their own appropriate courier services to the receiving laboratory. Pharmacies may choose to drop off the specimens themselves so long as they are packaged and shipped in accordance with the Transportation of Dangerous Goods Regulations under the *Transportation of Dangerous Goods Act, 1992*. In response to requests from pharmacies to assist in the identification of suitable and affordable transportation services, pharmacies are advised to contact the Ontario Pharmacist Association (OPA) or Neighbourhood Pharmacy Association of Canada for more information.

Restrictions

29. Are there any restrictions for the claims regarding the service of Specimen Collection for COVID-19 testing?

- 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.

30. I work in a hospital in-patient pharmacy. Can I submit claims for reimbursement?

No. The cost of the service of Specimen Collection for COVID-19 testing from hospital in-patient pharmacies must be covered through the hospital's budget.

31. At our pharmacy we screen for COVID-19 symptoms prior to administering the flu vaccine. Am I able to bill for an Assessment Fee?

No. Only participating pharmacies that are registered to provide COVID-19 testing may submit claims for a COVID-19 Assessment Fee.

Additional Questions

32. Is there any additional follow-up or care required for providing the service of Specimen Collection for COVID-19 testing? How will patients be notified of their test results?

Once the test has been processed by the licensed laboratory, the ordering pharmacist will be notified of the patient's test result (via fax*). In the event of a positive result for any patient, the pharmacist is required to contact the patient to inform them of their test result and provide information on potential next steps. Consistent with current practices, patients with a positive test result will also be contacted by Public Health Ontario to allow for contact tracing.

In the event of a negative result, pharmacists will not be required to inform the patient unless the patient is unable to obtain their results online (i.e., patient has no health card or an older red and white health card).

Patients who present their green health card at the time of their test will be able to obtain their own test results online, through the [ministry's access portal](#).

*Note: All results (positive and negative) will be sent to the pharmacies via fax during the initial phase of the roll-out of COVID-19 testing in pharmacies.

In the unlikely event of an indeterminate result, a pharmacist will contact the patient to communicate that their test result was indeterminate, advise that a second swab is required, and direct the client to a COVID-19 Assessment Centre to be re-tested. Pharmacies may provide patients with a copy of the indeterminate fax results received from the processing laboratory. **Please remove/black out the laboratory information** on the fax before providing it to the patient.

33. What are the labeling requirements for the collected specimens?

Specimens collected must be placed in a specimen bag with the completed COVID-19 virus test requisition form placed in the attached pouch so that the form is not exposed to the specimen. It is recommended that the swab is pre-labelled so that it can simply be dropped into the bag without further handling once the swab is obtained.

The label should contain the patient's full name, and two other unique identifiers, such as date of birth, health card number, postal code and/or gender.

Please refer to the document entitled [Asymptomatic PCR COVID-19 Testing Resource for Pharmacy](#) for further details.

34. What are the refrigeration storage requirements for specimen collection?

Specimens must not be stored with publicly funded vaccines. In addition, they should not be stored with drugs or medications that require refrigeration, nor with any food. If there is no separate refrigerator to store specimens prior to shipping, pharmacy staff may store specimens in a rigid outer shipping container (e.g., a Styrofoam cooler box) with an ice pack to maintain the optimal temperature.

35. I am having trouble putting the claim through the HNS. Who should I contact?

If pharmacies have any questions or concerns related to billing issues, please contact the ODB Help Desk at 1-800-668-6641.

For other inquiries related to COVID-19 testing in pharmacies, please send an email to: PublicDrugPrgrms.moh@ontario.ca