

Notice: Ontario Drug Benefit (ODB) Program Changes and Guidance for Dispensers during the COVID-19 Public Health Emergency

March 20, 2020

As the Government of Ontario continues to respond to the COVID-19 public health emergency, the Ministry of Health is recommending changes to ensure the safety of Ontarians, pharmacists and dispensing physicians. Effective immediately:

Days Supply and Early Refills

To lessen the risk of drug shortages that could result from increased demand due to the COVID-19 pandemic, the ministry is providing the following information to pharmacists and dispensing physicians.

- In order to protect drug supply and ensure that sufficient medication will be available for all Ontarians, the Ministry of Health is recommending pharmacists and dispensing physicians dispense no more than a 30-days' supply of ODB eligible medications. Dispensers may use professional judgment to provide a longer days' supply in exceptional cases with appropriate documentation. The supply should not exceed the usual supply for the patient.
- Pharmacy staff and dispensing physicians should reassure patients that stockpiling is not necessary. Measures to limit the quantity of medications received at one time will help ensure that all Ontarians have access to the medications they need.
- Pharmacies and dispensing physicians should manage their inventory to avoid stockpiling, lessening the risk that other pharmacies will not be able to provide medications to their patients.
- The ministry's policy for refilling a prescription for an ODB recipient is no more than ten days in advance of depleting their current supply. In exceptional cases where there is a clinical reason to refill a prescription early, the pharmacist or dispensing physician, using their professional judgement may provide a refill and document the reason.

Pharmacists are eligible to claim a dispensing fee for prescriptions dispensed for a 30-days' supply. To protect the safety of ODB recipients and other Ontarians and prevent drug shortages, the Executive Officer has temporarily:

- Specified that all medicines on the ODB Formulary and those funded through the Exceptional Access Program (EAP) are exempt from the conditions for the payment of a dispensing fee, if the dispenser determines that the quantity supplied should be less than the maximum quantity prescribed or payable under the ODB program. The dispenser's professional judgment should consider the safety of the ODB recipient or

any risk of abuse or diversion if the drug product is supplied to the ODB recipient. For clarity, this means that the dispenser can receive a dispensing fee for dispensing a 30-day supply of a medication even though a greater quantity has been prescribed or is payable under the ODB program.

- Removed the list of chronic medications subject to the five (5) dispensing fees per 365-days rule.

The ministry's website will be updated to reflect the above temporary changes.

MedsCheck

To reduce unnecessary in-person interactions, the ministry is temporarily providing more flexibility for the provision of MedsCheck services. Pharmacists may be reimbursed for MedsChecks performed virtually, or over the phone. Proper documentation is required and subject to post-payment verification. For MedsChecks performed virtually or over the phone during the pandemic period, a signature on the Patient Acknowledgement of Professional Pharmacy Services Form will not be required; pharmacists should document the inability to secure a signature on the form due to the COVID-19 pandemic. All other documentation requirements remain the same, as indicated in the Professional Pharmacy Services Guidebook.

MedsCheck appointments should be rescheduled where possible and only continue to be provided where medically necessary for the patient's understanding of their medications and to resolve urgent medication management issues (e.g., significant change to their medications after hospital discharge). Providing counselling to patients on a medication that is being dispensed remains part of the standards of practice for a pharmacist and is remunerated through the dispensing fee.

Trillium Drug Program and Seniors Co-Payment Program Applications

To facilitate the application process for Trillium Drug Program (TDP) and Seniors Co-Payment Program (SCP) during the COVID-19 pandemic, applications can be submitted through fax or email. Applications and supporting documents can be sent to:

Fax: (416) 642-3034; or

E-mail: trillium@ontariodrugbenefit.ca

NOTE: Ontarians faxing or emailing applications will be required to submit the original signed form by Canada Post when the pandemic is over. They should write in bold letters "Resubmit Originals" on the application form when mailing in the original application.

Exceptional Access Program Approvals

To allow health care practitioners to focus on urgent needs while limiting the need for ODB recipients to see their healthcare providers to renew necessary prescriptions, the Executive Officer of the Ontario Public Drug Programs has authorized the automatic extension of all EAP approvals that have expired or are expiring between February 1, 2020 to May 31, 2020 by an additional 90 days from the expiry date listed on the original approval letter. This will benefit prescribers and ODB recipients and will also enable the EAP to focus on new and urgent requests needed by Ontarians during this time.

Suspension of Inspections

The ministry is temporarily suspending pharmacy inspection activities for the purposes of post-payment verification of claims reimbursed under the ODB program.

Pharmacies are reminded that all submissions for payment under the ODB program are required to be in compliance with applicable laws and ministry policies and may be subject to post-payment verification when inspection activities resume.

Additional Information:**For pharmacies:**

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.

FAQs: COVID-19 and the ODB Program**1. Why is the ministry recommending that pharmacists dispense no more than a 30-day supply at a time during the pandemic?**

To ensure that every patient has an adequate supply of their medications, pharmacists and dispensing physicians are recommended to dispense no more than 30-days of medication at a time, if possible. Unnecessary stockpiling of medication can create unintended shortages and puts other patients' health at risk. This is aligned with the recommendation of the Canadian Pharmacists Association:

<https://www.pharmacists.ca/news-events/news/canadian-pharmacists-association-warns-against-stockpiling-medication-in-response-to-covid-19/>

2. Are pharmacists that dispense a chronic medication for 30 days (instead of the maximum 100 days) eligible for a dispensing fee?

Yes. During the pandemic period, pharmacists and dispensing physicians are eligible to claim a dispensing fee even if it is for a medication that is only entitled to a maximum of 5 dispensing fees per 365-day period that was listed on the Chronic-use Medication List. If the 5 dispensing fees have been reached already, the pharmacist can override the claim with the intervention code "UN" in order to receive the dispensing fee. Please remember that proper documentation is still required. All claims are subject to inspection and post-payment verification. Recoveries will be processed where overpayments are identified.

3. What if a patient needs more than a 30-day supply due to self-isolation, quarantine or other circumstances (e.g., patient unable to get to the pharmacy)?

It is recommended that pharmacists and dispensing physicians dispense no more than a 30-day supply if possible, to ensure that there is an adequate supply of medications for all Ontarians. Pharmacists and dispensing physicians should use their professional judgment to determine if a longer days' supply is required and document appropriately. Also note that pharmacies may offer a delivery service to help patients get their medications when they can't leave their home.

4. Is COVID-19 a valid reason to fill prescriptions early (i.e., more than 10 days before the expiry of a previous prescription)?

The Health Network System (HNS) provides a "refill too soon" warning for claims where additional supplies are submitted more than ten days prior to the end of a previous supply. Pharmacists and dispensing physicians should always use their professional judgment in consultation with the prescriber and patient when dispensing the next

prescription. The ministry recognizes that there are circumstances in which recipients may have a valid and appropriate reason for obtaining an early refill of a medication. In all cases, the reason for the early refill must be documented. The ministry will monitor claims to ensure that pharmacies and dispensing physicians comply with the HNS warnings and recoveries of payments will be made where claims are submitted inappropriately.

Patients who have run out of their medication or need more, are encouraged to call ahead to their regular pharmacy to determine whether the pharmacy can provide the additional supply.

5. Can I conduct a virtual MedsCheck during the pandemic?

During the pandemic, the ministry is temporarily providing more flexibility for the reimbursement of MedsCheck services and will allow reimbursement of MedsChecks performed virtually or over the phone, where medically necessary for the patient's understanding of their medications and to resolve urgent medication management issues (e.g., significant change to their medications after hospital discharge). For MedsChecks performed virtually or over the phone during the pandemic period, a signature on the Patient Acknowledgement of Professional Pharmacy Services Form will not be required; pharmacists should document the inability to secure a signature on the form due to the COVID-19 pandemic. All other documentation requirements remain the same, as indicated in the Professional Pharmacy Services Guidebook.

MedsCheck services should be rescheduled to a later date where possible.

As always, patients with any concerns about their medications should contact their pharmacist.