

Updated Executive Officer Notice: Specimen Collection for COVID-19 Testing of At-Risk Asymptomatic Persons through Ontario Pharmacies: Prerequisites, Billing Requirements, and Record Requirements

February 19, 2021

This Executive Officer Notice (and the accompanying Updated Executive Officer Notice: Specimen Collection for COVID-19 Testing of At-Risk Asymptomatic Persons through Ontario Pharmacies: Eligibility Criteria, and Qs and As) replaces all previous Executive Officer (EO) materials with regard to pharmacy services related to COVID-19 PCR laboratory testing. Updates in this notice provide important information relating to Prerequisites, Pharmacy Billing Information, and Pharmacy Record Requirements.

Background

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

- Permit licensed laboratories to accept a pharmacist's order to perform a COVID-19 test; and
- Exempt pharmacists from requiring a licence to collect a specimen for a COVID-19 test and/or conduct a COVID-19 point-of-care test.

Regulatory changes under the *Laboratory and Specimen Collection Centre Licensing Act* enable pharmacists to collect specimens for COVID-19 testing 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 select pharmacies to order and collect specimens for laboratory-based polymerase chain reaction (PCR) 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 of Health ("ministry") to provide services related to PCR COVID-19 laboratory testing before claims for payment can be submitted. Inappropriate claim submissions from non-registered pharmacies are subject to recovery.

At this point in time, the ministry is not funding pharmacies to conduct or provide services related to COVID-19 point-of-care tests.

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

http://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/2019_guidance.aspx

This notice and the accompanying notice regarding eligibility criteria and the 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 PCR COVID-19 laboratory testing. Compliance with all Ministry policies is required under section 3.2 of the Health Network System (HNS) Subscription Agreement for Pharmacy Operators.

Patient Eligibility

For the most up to date information on the **eligibility criteria** for specimen collection for PCR COVID-19 laboratory testing of at-risk asymptomatic persons through participating pharmacies, please refer to the EO Notice posted on the [ministry's website](#) entitled *Updated Executive Officer Notice: Specimen Collection for COVID-19 Testing of At-Risk Asymptomatic Persons through Ontario Pharmacies: Eligibility Criteria*. Please note the eligibility criteria may be updated from time to time and that EO Notice will be updated accordingly.

Prerequisites for Providing COVID-19 Test

Pharmacist training and guidance:

- Pharmacists should be familiar with specimen collection for PCR COVID-19 laboratory 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.

Note: There will be no daily testing limits on a pharmacy's specimen collection services or specimen kit ordering capacity at this time.

Pharmacy Billing Procedure

- The pharmacist who collects the COVID-19 specimen must be identified in the prescriber field on the claim for payment submitted 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 PCR COVID-19 laboratory 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 PCR COVID-19 laboratory 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. 	\$20.00

PIN	Description	Total Amount Paid
	<ul style="list-style-type: none"> 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 PCR COVID-19 Laboratory 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 (including Investigation Number, if applicable), collection of the specimen, notification of laboratory testing 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 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. 	Up to \$140.00

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

PIN	Description	Total Amount Paid
	<ul style="list-style-type: none"> 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. 	

Claims must be submitted using the ministry-assigned PIN associated with the pharmacy service provided. Claims must be billed using the service date (i.e. the date on which the pharmacy service is provided).

***Note:** Only asymptomatic individuals are eligible for publicly funded pharmacy services related to PCR COVID-19 laboratory testing. 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

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.

For purposes of post-payment verification and compliance with applicable legislation, pharmacy records related to claims for pharmacy services related to PCR COVID-19 laboratory testing must be maintained in a readily available format for the purpose of ministry inspection for a minimum of 10 years from the last recorded pharmacy service provided to the patient, or until 10 years after the day on which the patient reached or would have reached the age of 18 years, whichever is longer. Overpayments due to inappropriate claim submissions are subject to recovery.

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, and Ontario health card #
 - The date and time of the Assessment.
 - The name of the patient's 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 specimen collection was conducted 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 (including applicable Investigation Number, if applicable).
 - Environmental controls and infection control protocols were in place prior to specimen collection.
 - 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 collecting the specimen.
 - 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 collected the specimen along with a copy of the completed requisition form and a copy of the laboratory 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.

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