

Frequently Asked Questions for Pharmacists – October 2014

Pharmacist Administration of Publicly Funded Influenza Vaccine and Claims Submission using the Health Network System

Overview

As participants of Ontario's Universal Influenza Immunization Program (UIIP), trained pharmacists must be familiar with the UIIP manual as well as the Vaccine Storage and Handling Guidelines. Please access the Public Health website for more information: ontario.ca/flu or contact UIIP.MOH@ontario.ca

1. What is the trained pharmacist's role in the administration of publicly funded influenza vaccine to Ontarians?

As part of Ontario's Universal Influenza Immunization Program, trained pharmacists may deliver the publicly funded influenza vaccine to Ontarians who are five years of age and older in Government approved pharmacies.

2. What are the publicly funded influenza vaccines that are available to pharmacies?

For the 2014 - 15 influenza season, government approved pharmacies will be able to order the following publicly funded vaccines for administration by injection: Agriflu®, Vaxigrip®, Fluviral® Fluzone® and Flud®.

3. How do government approved pharmacies obtain the publicly funded vaccines?

Pharmacies within the "M" postal code will order the flu vaccine from the Ontario Government Pharmaceutical and Medical Supply Service; all other pharmacies will order the flu vaccine from their local public health unit. To locate your local public health unit please access the Public Health website for more information: www.ontario.ca/flu or contact UIIP.MOH@ontario.ca

4. How will the public know which pharmacies in Ontario are providing the influenza vaccine?

Once a pharmacy is approved by the ministry to administer publicly funded influenza vaccine, the pharmacy information will be listed on the ministry's flu clinic locator that can be accessed on the ministry website: ontario.ca/flu or contact UIIP.MOH@ontario.ca

Pharmacies are responsible for updating vaccine availability information (e.g., immunization clinic schedules) for their pharmacy location.

5. Are pharmacists authorized to administer non-publicly funded influenza vaccines?

No. Pharmacists are only authorized to administer publicly funded influenza vaccines for injection.

Eligibility

- 6. Are all Ontario residents eligible for the influenza vaccines administered by the pharmacist?**
No. Pharmacists may only administer the publicly funded influenza vaccine to Ontarians five years of age and older.
- 7. Are eligible Ontarians required to provide the pharmacist with consent for the publicly funded influenza vaccine to be administered by them?**
Yes. Completion of a consent form is required by the patient or the patient's authorized agent for the administration of the influenza vaccine.
- 8. Is there a form that the pharmacy can use to obtain patient consent for the administration of the publicly funded influenza vaccine?**
Pharmacists may contact the Ontario Pharmacists' Association for a patient consent form that can be used: www.opatoday.com
- 9. Can a person who does not have an Ontario Health Card still receive the publicly funded influenza vaccine from the pharmacist at a pharmacy?**
A trained pharmacist may administer the influenza vaccine at the approved pharmacy to someone who does not have an Ontario Health Card provided the patient is 5 years of age and older and has valid documentation that s/he lives, works or studies in Ontario; however, the pharmacist will not be paid the \$7.50 administration fee for these doses. Alternatively, pharmacists may direct these patients without a health card to the local public health unit for administration of the influenza vaccine. If the pharmacist does administer the vaccine to a patient without an Ontario Health Card, pharmacist must complete the required form for documentation purposes and submit it to their local public health unit. For more information, please contact UIIP.MOH@ontario.ca
- The form is available at:
[http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/GetFileAttach/014-4455-64E~3/\\$File/4455-64E.pdf](http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/GetFileAttach/014-4455-64E~3/$File/4455-64E.pdf)
- 10. Can the pharmacist still bill for the administration of the influenza vaccine if a patient forgot to bring his/her Ontario Health Card?**
The pharmacist needs the patient's Ontario Health Card number in order to submit payment through the Health Network System.

Ministry Payment

- 11. What is the amount paid by the ministry for a pharmacist to administer a vaccine for influenza to an eligible Ontarian?**
The ministry pays pharmacists \$7.50 for the administrative costs associated with delivering the publicly funded influenza vaccine to eligible Ontarians.
- 12. What is the amount paid to the pharmacy if a pharmacist is required to inject epinephrine as emergency treatment for patients experiencing a serious adverse drug reaction after receiving the influenza vaccine from a pharmacist?**
The ministry will reimburse pharmacies for the acquisition cost (no mark-up, dispensing or service fee) of approved epinephrine auto-injection products when used for emergency treatment in the

pharmacy or at the immunization location if the adverse event occurs shortly after a pharmacist administers the vaccine.

13. Is the ministry payment to the pharmacist directly or to the pharmacy?

The payment is paid through the ministry's Health Network System (HNS) to the accredited pharmacy that has a billing account for the Ontario Drug Benefit (ODB) program and that also holds a UIIP User Agreement with the ministry's Public Health Division.

Pharmacist Training

14. Are all Ontario pharmacists able to administer the influenza vaccines to eligible Ontarians?

No. Only trained pharmacists that are registered with the Ontario College of Pharmacists (OCP) as having completed an OCP approved training program and hold current First Aid and CPR certification may administer the publicly funded influenza vaccine. Pharmacists may not administer an influenza vaccine that is not publicly funded under the UIIP.

15. How will the public know if the pharmacist is properly trained to administer the influenza vaccine?

The Ontario College of Pharmacists' (OCP) member registry indicates those pharmacists who have the authority to administer the influenza vaccine (i.e., injection training) on its website. Pharmacists who administer the influenza vaccine must have successfully completed an OCP approved training program for administering injections as well as hold current certification in First Aid and CPR.

Pharmacy Participation

16. Will all Ontario pharmacies provide influenza vaccine to eligible Ontarians?

Only those pharmacies that are approved by the ministry via a User Agreement can provide the influenza vaccine to the public. Please refer to the ministry's Public Health Division for more information: ontario.ca/flu or contact: UIIP.MOH@ontario.ca

17. What is the process for a pharmacy to be approved to administer the influenza vaccine in Ontario?

Pharmacy managers must complete the ministry's *User Agreement for Pharmacies Requesting Publicly Funded Influenza Vaccine* each year. Requirements stipulated under the User Agreement must be met in order to qualify to participate in the Universal Influenza Immunization Program. For more information on the User Agreement, pharmacists should contact the ministry's Public Health Division: UIIP.MOH@ontario.ca

18. What are the requirements for pharmacies under the ministry's User Agreement?

Pharmacy requirements under the user agreement include having at least one trained pharmacist on staff to administer the influenza vaccine, meeting Ontario's *Vaccine Storage and Handling Guidelines* and having an approved cold chain inspection of the pharmacy refrigerator by public health.

For complete information on pharmacy requirements under the User Agreement, pharmacist should contact the Public Health Division at: ontario.ca/flu or contact: UIIP.MOH@ontario.ca

19. I work at a pharmacy that does not provide the influenza vaccine. Where do I find information to refer patients to the closest pharmacy that does provide this service?

The ministry has a flu clinic locator on its website: www.ontario.ca/flu . Patients can be referred to this website to locate a pharmacy or a public health flu clinic in their area.

Documentation and Record Keeping

20. What is the pharmacist required to document when providing the influenza vaccine to eligible patients?

The pharmacist must keep a record of every dose of publicly funded vaccine that was administered and must document the:

- Name and lot # of the publicly funded vaccine that was administered
- Time and date the vaccine was administered
- Name of patient
- Signed and dated patient consent form
- Name and signature of the trained pharmacist who administered the vaccine
- Written record of influenza immunization provided to the patient

21. How long must I keep the influenza vaccine administration record on file?

All documentation records relating to the administration of the flu vaccine claim must be maintained in a readily retrievable format for the purposes of audit under the Ontario Drug Benefit program. All patient health records must be retained by the pharmacist in a readily retrievable format and kept on file at the pharmacy for a minimum period of ten years or as per O.Reg. 58/11 of the *Drug and Pharmacies Regulation Act*.

22. What will happen if I forget to document the required information when providing the influenza vaccine administration by the pharmacist?

If there is no documentation or incomplete documentation regarding the pharmacist administered influenza vaccine, the administration fee claim is subject to recovery. Documentation is important in the event of a vaccine recall or an adverse event following the immunization.

23. What documentation should pharmacists provide to the patient after administration of the flu vaccine?

To help patients keep track of their influenza vaccine, the pharmacist should be prepared to provide a written record of the influenza immunization product that was administered including the date. This can be accommodated by providing the patient with a permanent personal immunization record. Patients should keep this in a safe place and have it available for future immunization visits and/or visits to other health care providers. Patients should be aware that the information will be available on file at the pharmacy should it be required.

24. Is there a standardized form that is used for patient consent and for the permanent personal immunization record?

Pharmacists may want to refer to the Ontario Pharmacists' Association *Influenza Vaccination Toolkit* for resource information including a template for patient consent forms, patient questionnaires and permanent personal immunization records.

Claim for Payment through the HNS

25. When does the pharmacist submit the claim for payment for administration of the flu vaccine?

Pharmacists should submit the claim for payment through the Health Network System after administering the flu vaccine to the patient on the same day of administration.

If a flu vaccine was administered off-site and in compliance with the requirements of the User Agreement, pharmacists may submit the claim on the next business day provided the correct date and time of administration is noted on the record.

26. How are claims for influenza vaccine submitted through the Health Network System?

Claims must be submitted for publicly funded vaccine only using the appropriate DIN (or PIN if applicable) that was administered to the patient. Pharmacists must not enter a drug cost or a dispensing fee or a mark-up on publicly funded influenza vaccines.

Pharmacists must ensure that the patient's correct date of birth, the health card number and name (as it appears on the Health Card) are entered accurately as part of the HNS claims submission. Failure to do so especially for non-ODB patients may impact the ability to submit future claims for these patients.

In the event of an adverse drug reaction due to an influenza vaccine administered by the pharmacist, pharmacists who administer epinephrine to render emergency assistance to the patient may submit the claim using the assigned PIN for the epinephrine product. Do not enter the DIN or a mark-up or a dispensing fee for emergency use of epinephrine auto-injection for this purpose.

Please refer to question 30 regarding adverse event following immunization reporting requirements.

27. If a registered nurse administered the vaccine, am I able to claim those doses through the Health Network System.

No. Claims may not be submitted for vaccinations or emergency use epinephrine auto-injection provided by other health care providers, like nurses hired for pharmacy clinics. For information on nurse-led pharmacy clinics, please access ontario.ca/flu or contact: UIIP.MOH@ontario.ca

28. What is the procedure to submit a claim for a publicly funded influenza vaccination for an ODB patient?

The claim submission for an ODB eligible patient follows the process for submitting claims on the HNS using the appropriate DIN (or PIN if applicable) of the product that was administered, the intervention code 'PS' as well as the valid pharmacist identification code of the pharmacist who administered the vaccine.

29. What is the procedure to submit a claim for a pharmacist-administered influenza vaccination for a NON-ODB patient?

When submitting a pharmacist-administered influenza vaccine 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' (This is the plan code for non-ODB MedsCheck Service plan)
- Drug Identification Number (DIN) (or PIN if applicable): as per the influenza vaccine administered.
- The valid Pharmacist ID code of the pharmacist who administered the vaccine must be included with the claim.

Adverse Drug Reactions

30. What are the reporting requirements if there has been an adverse event following immunization?

The User Agreement requires that all adverse events following immunization (AEFI) must be reported to the local medical officer of health. This is stipulated in section 38 of the Health Protection and Promotion Act. Pharmacists must report an AEFI with influenza vaccine to their local medical officer of health within 1 business day after the reportable event is recognized. Pharmacists should refer to the pharmacy User Agreement for the reporting requirements for Adverse Events following immunization. For additional information please contact your local public health unit. A list of public health units in Ontario is available at www.health.gov.on.ca/en/common/system/services/phu/locations.aspx

31. What is in place regarding ministry reimbursement should a patient experience an adverse reaction after the pharmacist administered the influenza vaccine?

In the event of an adverse drug reaction resulting from a pharmacist's administration of the publicly funded influenza vaccine, the ministry will reimburse pharmacies for the cost of the epinephrine auto-injection when used for emergency treatment in the pharmacy or at the immunization location.

32. Should an adverse reaction occur after the pharmacist administers the influenza vaccine, who is responsible for administering the epinephrine auto-injection if it is warranted?

Should the adverse reaction occur at the pharmacy, the trained pharmacist who administered the influenza injection will be the individual who would administer the epinephrine auto-injection to the patient in an emergency event. Under the Regulated Health Professions Act, 1991 (RHPA), the administration of a substance by injection is a controlled act which unauthorized persons are prohibited from performing. Under the Pharmacy Act, 1991 (PA), certain pharmacists are authorized to inject individuals with epinephrine in the course of providing health care services to an individual (subject to the conditions laid out in regulation under the PA which include the condition that a pharmacist only perform the act for the purpose of patient education and demonstration). Where the administration of a substance by injection is done for the purposes of rendering first aid or temporary assistance in an emergency, the RHPA exempts such injections from the controlled act prohibition regardless of who performs it. Pharmacists authorized to administer the influenza vaccine must maintain certification in CPR and First Aid.

For valid claims submission, the ministry requires valid pharmacist identification for the use of an epinephrine auto-injection for this purpose.

33. When the pharmacy submits a claim for administering the epinephrine auto-injection is there specific documentation required by the ministry?

In addition to the reporting requirements for adverse events following immunization as per the pharmacy User Agreement, pharmacists must document for the purpose of auditing when they have administered the epinephrine auto-injection. The HNS claim for the epinephrine auto-injection will follow the claim for pharmacist-administered influenza vaccine. Documentation includes:

- Name and signature of the pharmacist who administered the epinephrine auto-injection
- Name of the epinephrine auto-injection that was administered
- Name of Patient
- Time and date the epinephrine auto-injection was administered
- Cross-reference to the vaccine administration HNS claim for the patient receiving epinephrine

34. What are the record keeping requirements for epinephrine auto-injection when claimed for emergency administration due to a pharmacist administered influenza vaccine?

As for any HNS claim, pharmacies must keep a record of the required documentation when administration of the epinephrine auto-injection has occurred and then claimed for reimbursement through the HNS. Records must be maintained at the pharmacy in a readily retrievable format for ministry audit and for a minimum 10 year period as part of the patient's health record.

35. Using the assigned PIN, when submitting the claim for the epinephrine auto-injection due to an adverse reaction resulting from the pharmacist-administered influenza injection, I notice the payment appears in the "dispensing fee" field; is that appropriate?

Yes. The payment for administering the epinephrine auto-injection for emergency use is set-up to reimburse pharmacies for the acquisition cost of the product that will appear in the "dispensing fee" field of the claims submission.

Restrictions

36. Can pharmacists provide the influenza vaccine to residents of Long Term Care (LTC) Homes?

Administration of the publicly funded influenza vaccine to long-term care residents is not eligible for reimbursement by pharmacists through the HNS system.

37. Can the pharmacist administer the nasal influenza vaccine product or other influenza vaccines that are not publicly-funded?

No. Administration of influenza vaccines by pharmacists is restricted to the UIIP. Therefore administration of vaccines that are not publicly funded is currently outside the scope of practice of pharmacists.

38. Can I submit pharmacist-administered publicly funded influenza vaccine doses manually to the ministry using a paper claim?

No. The ministry does not accept paper claims for pharmacy-administered publicly funded influenza vaccines.

39. Is there a way to submit a claim for a pharmacist-administered publicly funded influenza vaccine when the patient forgets to bring his/her Ontario health card?

No. The Ontario Health Card number is required for the pharmacy to submit a claim for a pharmacist-administered publicly funded influenza vaccine.

40. Can I submit the influenza vaccines that were administered by a nurse at the pharmacy clinic?

No. Claims may not be submitted through the Health Network System for vaccinations provided by other health-care professionals, such as nurses hired for pharmacy clinics. Pharmacists who wish to continue providing nurse-led pharmacy flu clinics will continue with the manual process of billing through the Public Health Division. For more information on nurse-led pharmacy clinics, please contact public health at: ontario.ca/flu or contact UIIP.MOH@ontario.ca

41. Is the epinephrine auto-injection intended to be used and reimbursed at cost by the ministry in the event that a patient has an adverse reaction after the nurse administers the influenza vaccine or after a pharmacist administers the influenza vaccine?

The ministry will reimburse the pharmacy via the HNS in the event that the patient suffers an adverse reaction shortly after a pharmacist administers the influenza vaccine. Nurses who deliver the influenza immunization at pharmacy clinics are responsible for providing their own emergency supplies at pharmacy influenza clinics.

42. Can I submit a claim for the epinephrine auto-injection when it's provided to the patient to take home should they experience an adverse reaction after leaving the pharmacy?

No. Claims submitted for epinephrine auto-injection using the assigned PIN are reimbursed when the injection is given by the pharmacist as emergency first aid or temporary assistance in an emergency after injection of a publicly funded influenza vaccine.

43. As a pharmacist who administers epinephrine to a patient for the purpose of demonstration or education, am I allowed to claim for reimbursement of this service?

No. Injections (or inhalations) that are administered by pharmacists for demonstration or education are not funded by the Ontario government. Only the acquisition cost of epinephrine auto-injection when used immediately following a pharmacist-administered influenza vaccine due to an adverse reaction is reimbursed by the ministry via the HNS.

44. If the pharmacist recommends to the physician that the patient get his or her influenza vaccine, is the recommendation billable under the Pharmaceutical Opinion Program?

No. A pharmacist's recommendation to the physician for the patient to get the influenza vaccine, whether the vaccine is publicly funded or not, does not meet the criteria of the Pharmaceutical Opinion Program as all Ontarians are encouraged to receive the flu vaccine. Any claims submitted for this reason will be subject to recovery.