

Frequently Asked Questions for Pharmacists – October 2017: Pharmacist Administration of the Publicly Funded Influenza Vaccine and Claims Submission using the Health Network System

Pharmacists participating in Ontario’s Universal Influenza Immunization Program (UIIP) for the 2017/2018 season and will be receiving publicly funded influenza vaccine (i.e., injectable and nasal spray formats) must be familiar with the Vaccine Storage and Handling Guidelines. For more information, please review the ministry’s UIIP website at ontario.ca/influenza or contact UIIP.MOH@ontario.ca.

This Frequently Asked Questions document contains various aspects of UIIP in the following sections.

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Overview

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

Along with serving as advocates and promoters of broad-based public vaccination against influenza, injection-trained pharmacists may deliver the publicly funded influenza vaccine eligible to Ontarians five years of age and older in government approved pharmacies in strict accordance with the an approved UIIP User Agreement and Health Network System (HNS) Subscription Agreement with the government.

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

For the 2017/2018 influenza season, government approved pharmacies will be able to order, free of charge, the following injectable publicly funded influenza vaccines: FluViral[®], Influvac[®], FluLaval Tetra[®], and Fluzone Quadrivalent[®]. In addition, publicly funded nasal spray influenza vaccine FluMist[®] (nasal spray) will be available.

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

For the 2017/2018 influenza season, the second year of the pilot program will continue whereby UIIP-approved pharmacies located outside of Toronto’s postal code ‘M’ will order UIIP-approved vaccines (at no charge) via their primary pharmaceutical wholesaler. Pharmacies located within Toronto’s postal code ‘M’ will not be part of this pilot and will continue to order vaccines through the Ontario Government Pharmaceutical and Medical Supply Service (OGPMSS) as per usual.

The ministry will provide information to pharmacies in regards to which distributor the pharmacy will be ordering vaccine from. In addition, pharmacies outside of Toronto will receive more specific details directly from their wholesaler over the next several days. This will include information of daily order limits and protocols for returns of wasted vaccine.

Pharmacies that have been approved to participate in the UIIP that are located:	Order vaccine from:
within Toronto (within the M postal code)	Ontario Government Pharmaceutical and Medical Supply Service (OGPMSS) by faxing the Influenza Vaccine Order Form for the UIIP to 416-327-0818
outside Toronto (not within the M postal code)	Wholesale distributors: <ul style="list-style-type: none"> • Kohl & Frisch Limited • McKesson Canada • McMahan Distributeur Pharmaceutique Inc. • Shoppers Drug Mart

4. How will the public know which pharmacies in Ontario are providing publicly funded influenza vaccines?

All participating pharmacies will be listed on the ministry's flu clinic locator at ontario.ca/influenza. Alternatively, members of the public can email UIIP.MOH@ontario.ca for locations.

Each pharmacy is responsible for updating vaccine availability information on the flu clinic locator (e.g., immunization clinic schedules).

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

To receive payment from the ministry, pharmacists can only administer publicly funded influenza vaccines according to the UIIP agreement.

For questions on whether a pharmacist has the authority beyond the UIIP parameters, please contact the Ontario College of Pharmacists (OCP).

Eligibility

6. Are all Ontario residents eligible for the influenza immunization administered by the pharmacist?

No. Pharmacists can only administer the publicly funded influenza immunization to Ontarians five years of age and older.

Pharmacists must also abide by the recommended age criteria for vaccine administration.

7. Are Ontarians required to provide consent before pharmacists administer the flu immunization?

Yes. Completion of a consent form is required by the patient or the patient's authorized representative or substitute decision maker prior to administration of the influenza immunization.

To get a form, pharmacists may contact the Ontario Pharmacists Association (OPA) at www.opatoday.com.

8. Can a person who does not have an Ontario health card number still receive the publicly funded influenza vaccine at a pharmacy?

Yes. A pharmacist can administer the influenza vaccine to someone without an Ontario health card number provided they are at least 5 years old and have valid documentation that they live, work or study in Ontario. However, the pharmacist will not be paid any administration fee for these doses.

Alternatively, pharmacists may direct patients without a health card number to the local public health unit for the influenza vaccine.

If the pharmacist does administer the vaccine to a patient without an Ontario health card number, the pharmacist must complete the required form, and submit it to their local public health unit. For more information, please contact UIIP.MOH@ontario.ca.

The form is available at:

[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)

9. Can a pharmacist still bill for the administration of the influenza vaccine if a patient forgot to bring his/her Ontario health card number?

No. The pharmacist needs the patient's Ontario health card number in order to submit payment through the HNS.

Ministry Payment

10. How much does the ministry pay pharmacists to administer the influenza vaccine?

The ministry pays pharmacists:

- \$7.50 for the costs associated with administering an injectable publicly funded influenza vaccine and
- \$5.00 to administer the publicly funded influenza vaccine by nasal spray (FluMist®).

11. How much does the ministry pay a pharmacist if they are required to inject epinephrine as emergency treatment for patients experiencing a serious adverse drug reaction due to the influenza vaccine?

The ministry will reimburse pharmacies the acquisition cost (no mark-up, dispensing or service fee) of approved epinephrine auto-injection products up to the Total Amount Reimbursed (i.e., see Table 2 of the EO Notice) when used in this circumstance.

12. Does the ministry pay the pharmacist directly or to the pharmacy?

For pharmacies who hold a UIIP User Agreement with the ministry, payment is paid through the ministry's HNS to the accredited pharmacy.

Pharmacist Training

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

No. Only trained pharmacists registered with the OCP as having completed an OCP approved training program and hold current First Aid and CPR certification may administer the publicly funded influenza vaccine. The trained pharmacists are listed on the OCP member registry website.

In addition, pharmacies will not receive payment under the UIIP program if administering non-publicly funded influenza vaccine that is not included under the UIIP.

14. Will pharmacists have to re-certify for FluMist, or if they have already done the certification?

Administration of FluMist nasal spray is not a controlled act in Ontario, so it does not require the same training/certification as that of the injectable publicly funded influenza vaccine format.

However, pharmacists may want to refer to manufacturer recommendations or other healthcare provider educational programs regarding the administration of FluMist. For more information, please email UIIP.MOH@ontario.ca.

15. Can pharmacists administer FluMist to adults outside of the UIIP, or can they only administer FluMist to Ontarians aged 5-17?

Pharmacists may administer privately purchased FluMist to individuals 2 to 59 years of age as indicated in the product monograph. However, publicly funded FluMist vaccine can only be administered to children 2 to 17 years.

Parents with children who are between 2 to 4 years of age, who are choosing to purchase FluMist vaccine from the pharmacy, must be informed that their child is eligible to receive publicly funded FluMist vaccine from their primary health care provider. Should the parent still opt to proceed with privately purchased FluMist from the pharmacy and forego the publicly-funded option, pharmacists should document parental consent, provide a record of immunization to the parent, and as best practice, inform the primary health care provider of vaccine administration.

The ministry will only pay for publicly funded FluMist doses administered by pharmacists to Ontarians aged 5 to 17 years.

Pharmacy Participation

16. Will all Ontario pharmacies provide the publicly funded influenza vaccine?

No. Only pharmacies approved by the ministry via a User Agreement and HNS Subscription Agreement can provide the publicly funded influenza vaccine to the public.

For more information, please refer to the ministry's Population and Public Health Division's website at ontario.ca/influenza or email UIIP.MOH@ontario.ca.

17. How does a pharmacy get approved to administer the influenza vaccine in Ontario?

To get approved, pharmacy managers must complete the ministry's *User Agreement for Pharmacies Requesting Publicly Funded Influenza Vaccine* each year.

For more information on the User Agreement, please email the ministry's Population and Public Health Division at UIIP.MOH@ontario.ca.

18. What are the User Agreement requirements?

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 the local public health unit.

For complete information on pharmacy requirements under the User Agreement, please review the Population and Public Health Division at ontario.ca/influenza or email UIIP.MOH@ontario.ca.

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

You can locate the nearest participating pharmacy on the ministry's flu clinic locator at www.ontario.ca/influenza. Patients can use this website to locate the nearest participating pharmacy or a public health unit flu clinic.

Documentation and Record Keeping

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

The pharmacist must keep a record of every dose of publicly funded influenza vaccine administered and must:

- Document the name and lot # of the publicly funded influenza vaccine administered
- Document the time and date the vaccine administered
- Document the name of patient
- Ensure the consent form is signed and dated by the patient
- Document the name and signature of the trained pharmacist who administered the vaccine
- Provide a written record of the influenza immunization to the patient
- Record any serious adverse drug reaction that may or may not result in the administration of epinephrine

Please note that pharmacists are to enter the patient's date of birth and health card number into the pharmacy system. Failure to do so will affect future claims transactions for non-ODB recipients. In addition, by identifying the date of birth, pharmacists can align the appropriate vaccine to the patient's age group.

Documentation forms are not standardized, but the Ontario Pharmacists Association has created a comprehensive form that may assist pharmacies with their record keeping

obligations under the UIIP. The OPA's form and additional resources (the OPA Influenza Vaccination Toolkit) are available at:

www.opatoday.com/professional/resources/for-pharmacists/tools-and-forms/uiip.

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

All documentation records relating to the administration of the influenza vaccine claim must be maintained in a readily retrievable format for the appropriate record retention period of at least 10 years from the last recorded professional 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.

22. What will happen if I forget to document or misplace the documentation?

If there is no documentation, incorrect or incomplete documentation, the administration fee claim is subject to recovery by the ministry. Documentation is also important in the event of a vaccine recall or an adverse event following an immunization.

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

To help patients keep track of their influenza vaccine, the pharmacist must provide a written record of the influenza immunization product 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 also be aware that the information is available on file at the pharmacy.

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

For more information on forms, pharmacists can refer to the *OPA Influenza Vaccination Toolkit*, which includes resources such as a template for patient consent forms, patient questionnaires and permanent personal immunization records.

Claim for Payment through the HNS

25. When should the pharmacist submit the claim for payment for administration of the publicly funded influenza vaccine?

Pharmacists should submit the claim through the HNS the same day they administer the publicly funded influenza vaccine.

If a publicly funded influenza vaccine was administered off-site and in compliance with the requirements 23 and 24 of the User Agreement, pharmacists can submit the claim up to one business day after administration.

26. How are claims for influenza vaccine submitted through the HNS?

Claims must be submitted using the product's DIN (or PIN for emergency epinephrine administration). Pharmacists must not enter a drug cost, dispensing fee, or a mark-up for the administration fee. The administration fee of either \$7.50 or \$5.00 will appear in the "dispensing fee" field.

Pharmacists must ensure that the patient's date of birth, health card number and name (as it appears on the health card) are entered as part of the HNS claims submission. Failure to do so may impact the ability to submit future claims for these patients. In addition, by identifying the date of birth pharmacists can align the appropriate vaccine to the patient's age group.

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 may submit the claim using the assigned product identification number (PIN) for the epinephrine product. *Do not enter the DIN, a mark-up or a dispensing fee for this emergency use of epinephrine auto-injection.*

Please refer to question 32 regarding adverse event following immunization reporting requirements.

27. If a registered nurse at my pharmacy administers the vaccine, am I able to claim those doses through the HNS?

No. Claims are not accepted for vaccinations or emergency use epinephrine auto-injection provided by other health care providers, such as nurses hired for pharmacy clinics. For information on nurse-led pharmacy clinics, please access ontario.ca/influenza or email UIIP.MOH@ontario.ca.

28. How does a pharmacist submit a claim for an ODB patient?

Through the HNS, use the appropriate product DIN (or PIN if applicable), the intervention code 'PS' as well as the valid pharmacist identification code.

29. How does a pharmacist submit a claim for a non-ODB patient?

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

- Patient Gender: 'F' = female; 'M' = male
- Patient Date of Birth: 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 for an adverse event following immunization?

All adverse events following immunization (AEFI) must be reported to the local Medical Officer of Health within one business day, per section 38 of the *Health Protection and Promotion Act*.

For complete reporting requirements, please refer to the pharmacy User Agreement for Adverse Events. For additional information, please contact your local public health unit. A list of Ontario public health units is available at www.health.gov.on.ca/en/common/system/services/phu/locations.aspx.

31. If a patient has an adverse reaction to the influenza vaccine, who is responsible for administering the epinephrine auto-injection?

Should the adverse reaction occur at the pharmacy, the pharmacist who administered the influenza vaccine should also administer the epinephrine auto-injection.

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.

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

32. What documentation does the ministry require for an epinephrine auto-injection claim submission?

In addition to the reporting requirements for adverse events following immunization per the pharmacy User Agreement, pharmacists must also document when they administer the epinephrine auto-injection for auditing purposes.

The HNS claim for the epinephrine auto-injection will follow the claim for the influenza vaccine. Documentation includes:

- Name and signature of the pharmacist who administered the epinephrine auto-injection
- Name of the epinephrine auto-injection administered
- Name of the patient
- Time and date the epinephrine auto-injection was administered
- Cross-reference with the publicly funded influenza vaccine administered to the same patient

33. What are the record keeping requirements for an epinephrine auto-injection in this circumstance?

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.

Pharmacy documentation must be maintained in a readily retrievable format for the appropriate record retention period of at least 10 years from the last recorded professional 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.

34. When submitting the claim for the epinephrine auto-injection due to an adverse reaction from the influenza injection, I notice the payment appears in the “dispensing fee” field – is that correct?

Yes, the payment appears in the “dispensing fee” field of the claims submission.

Restrictions

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

No. Administration of the publicly funded influenza vaccine to long-term care residents is not eligible for reimbursement by pharmacists through the HNS system.

36. Can I submit claims for influenza vaccine administration manually to the ministry, using a paper claim?

No. The ministry does not accept paper claims publicly funded influenza vaccines.

37. Can I submit a claim for influenza vaccines administered by a nurse at a pharmacy clinic?

No. HNS claims are not permitted for vaccinations administration by other health-care professionals, such as nurses hired for pharmacy clinics.

Pharmacists who wish to continue providing nurse-led pharmacy flu clinics must follow the manual process of billing through the Population and Public Health Division. For more information on nurse-led pharmacy clinics, please contact Population and Public Health Division at ontario.ca/influenza or email UIIP.MOH@ontario.ca.

38. Will the ministry reimburse the cost of the epinephrine auto-injection when administered by a nurse?

No. The ministry will only reimburse the pharmacy via the HNS in the event that the patient suffers an adverse reaction after a pharmacist administers the influenza vaccine.

Nurses who deliver the influenza immunization at pharmacy clinics are responsible for providing their own emergency supplies.

39. Can I submit a claim for the epinephrine auto-injection when it is provided to the patient to take home?

No. Claims submitted for epinephrine auto-injection are only reimbursed when the injection is given by the pharmacist as emergency first aid or temporary assistance in the pharmacy.

40. If the pharmacist recommends a patient get his or her influenza vaccine from their physician, is the recommendation billable under the Pharmaceutical Opinion Program?

No, because all Ontarians are encouraged to receive the flu vaccine and also because its administration is within the pharmacist's scope of practice and requires no permission from a primary care provider, such a recommendation does not meet the criteria of the Pharmaceutical Opinion Program.