

April 20, 2020

Brian Pollard
Assistant Deputy Minister, Long-Term Care Operations Division
Ministry of Long-Term Care
400 University Avenue, 6th Floor
Toronto, ON M5G 1S5
Email: brian.pollard@ontario.ca

Dear Mr. Pollard;

Re: Ontario Pharmacists Association Recommendations in Response to COVID-19 Affecting Pharmacy Service Providers of Long-Term Care Homes

In recognizing the current challenges and extraordinary strain on long-term care homes as a result of the COVID-19 pandemic, and in considering the current recommendations in place to protect the health of residents and staff working in these facilities, the Ontario Pharmacists Association (OPA), in consultation with its Long-Term Care Working Group, is recommending the following changes be enabled:

- 1) The temporary suspension, in accordance with recommendations below, of any activities requiring the on-site presence of the pharmacy service provider, with the exception of drug delivery, unless in the opinion of the Medical Director, Director of Nursing and Personal Care, and/or Consultant Pharmacist the service is deemed medically necessary;
- 2) The temporary approval to allow two members of the registered nursing staff, appointed by the Director of Nursing and Personal Care, to perform all drug destruction and disposal, including that of controlled substances.

Ontario's *Long-Term Care Homes Act, 2007* and *Ontario Regulation 79/10* require the participation of the pharmacy service provider in several activities typically conducted on-site at the long-term care home. These include:

- *Ontario Regulation 79/10, s.115(1)* requires that every licensee of a long-term care home shall ensure that an interdisciplinary team, which must include the Medical Director, the Administrator, the Director of Nursing and Personal Care and the pharmacy service provider, meets at least quarterly to evaluate the effectiveness of the medication management system in the home and to recommend any changes necessary to improve the system.
- *Ontario Regulation 79/10, s.116(1)* requires that every licensee of a long-term care home shall ensure that an interdisciplinary team, which must include the Medical Director, the Administrator, the Director of Nursing and Personal Care, the pharmacy service provider and a registered dietitian who is a member of the staff of the home, meets annually to evaluate the effectiveness of the medication management system in the home and to recommend any changes necessary to improve the system.

- *Ontario Regulation 79/10, s.120(4)* requires the pharmacy service provider to develop audit protocols for the pharmacy service provider to evaluate the medication management system
- *Ontario Regulation 79/10, s.120(6)* requires the pharmacy service provider to participate in drug destruction and disposal if required by the licensee's policy
- *Ontario Regulation 79/10, s.134(c)* requires every licensee of a long-term care home to document, at least quarterly, a reassessment of each resident's drug regime
- *Ontario Regulation 79/10, s.136(3)(a)* requires that in the case of a controlled substance, subject to any applicable requirements under the *Controlled Drugs and Substances Act (Canada)* or the *Food and Drugs Act (Canada)*, drugs must be destroyed by a team acting together and composed of (i) one member of the registered nursing staff appointed by the Director of Nursing and Personal Care, and (ii) a physician or a pharmacist.

On March 19, 2020, the Ministry of Health issued *COVID-19 Directive #2 for Health Care Providers* which states that "all non-essential and elective services should be ceased or reduced to minimal levels, subject to allowable exceptions, until further notice". Additionally, *Directive #3 for Long-Term Care Homes* under the *Long-Term Care Homes Act, 2007* requires that wherever possible, the number of work locations that staff, contractors and volunteers are working at should be limited to minimize risk to residents of exposure to COVID-19. In support of this, OPA recommends that all consultant pharmacists employed by the contracted pharmacy service provider of the long-term care home, many of whom are typically responsible for servicing multiple facilities, refrain from working physically within the long-term care homes unless deemed medically necessary by the Medical Director and/or the Director of Nursing and Personal Care and/or the pharmacy service provider.

In consideration of the current staffing challenges being experienced by long-term care homes and pharmacies, as well as the challenges associated with the delivery of virtual care by prescribers, OPA recommends that any activity requiring the on-site presence of the pharmacy service provider, with the exception of drug delivery, should be temporarily suspended during the COVID-19 pandemic, unless in the opinion of the Medical Director, Director of Nursing and Personal Care, and/or pharmacy service provider the service is deemed medically necessary. Pharmacy services, including those listed above, may continue to be provided through alternate methods of communication, including telephone and virtual technologies where appropriate, and the decision to suspend or postpone any of these activities should be made in collaboration with all parties involved. Pharmacy services should focus on supporting the recommendations from the *COVID-19 Outbreak Guidance for Long-Term Care Homes*, including reviewing all residents' medication administration schedules to consolidate and streamline as much as possible to minimize the number of times staff need to enter a resident's room through switching medications to less frequently dosed formulations or reducing dosing frequency; reassessing non-standard medication administration times; aligning medication administration times to coincide with timing of other resident care tasks; and reassessing the need for non-essential medication.

With respect to drug destruction and disposal, *Ontario Regulation 79/10, s.136(2)2.* requires that any controlled substance that is to be destroyed and disposed of must be stored in a double-locked storage area within the home and *Ontario Regulation 79/10, s.136(3)(a)* requires that a controlled substance must be destroyed by a team acting together and composed of (i) one member of the registered nursing staff appointed by the Director of Nursing and Personal Care, and (ii) a physician or a pharmacist. In light of the on-going pandemic and OPA's recommendation that all consultant pharmacists employed by the contracted pharmacy service provider of the long-term care home refrain from working within the long-term care homes



unless deemed medically necessary, there is an operational need for long-term care homes to continue to safeguard their drug supply, which may include the routine destruction and disposal of controlled substances. Consequently, OPA is of the opinion that the destruction and disposal of *all* drugs, including that of controlled substances, by two members of the registered nursing staff, appointed by the Director of Nursing and Personal Care, should be temporarily allowed during the COVID-19 pandemic. The documentation required for controlled substances as required by *Ontario Regulation 79/10, s.136(4)* must still be completed and the need to perform destruction of controlled substances during the pandemic should be determined by the licensee of the long-term care home.

The aforementioned recommendations are submitted with the intention of temporarily ceasing all non-essential activities in accordance with Directive #2, minimizing the number of healthcare providers working onsite in the long-term care home in accordance with Directive #3, and decreasing any unnecessary reliance on and utilization of personal protective equipment in long-term care homes. Should you have any questions or concerns regarding these recommendations and comments, please do not hesitate to contact me at amalek@opatoday.com or by cell phone at 416-949-0788 at your earliest convenience.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Allan Malek", is written over a light blue horizontal line.

Allan H. Malek, R.Ph.
Executive VP and Chief Pharmacy Officer

cc: Ms. Michelle-Ann Hylton, Director, Licensing, Policy and Development Branch,
Ministry of Long-Term Care
Mr. Justin Bates, CEO, Ontario Pharmacists Association
Ms. Kacie Lunn, Chair, Ontario Pharmacists Association Long-Term Care Working Group
Ms. Jen Baker, Chair, Ontario Pharmacists Association Board of Directors
Members of the Ontario Pharmacists Association Long-Term Care Working Group