

September 2, 2020

Ms. Vivian Leong
Senior Manager, Integration and Policy Unit,
Ontario Ministry of Health
North American Centre
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Dear Vivian:

On behalf of the Ontario Pharmacists Association ('OPA', the 'Association'), I would like to provide some clarity regarding the status and degree of pharmacy software vendor ('PSV') compliance with official forms produced by the Ministry of Health (the 'Ministry') for the purposes of the Ontario MedsCheck™ Program. In addition, this letter will also serve to articulate the impact of these forms on the implementation and utility of the MedsCheck service for patients.

Background

With the introduction of the Ontario MedsCheck Program in April 2007, the Ministry of Health and the Ontario Pharmacists Association were jointly tasked with oversight of this and other professional pharmacy services through the legislative creation of the Pharmacy Council under paragraph 1.4 of the *Ontario Drug Benefit Act, R.S.O. 1990, Chapter O.10* ('ODBA').¹ Between the time of the program's launch and 2016, that coincided with the introduction of new mandated and templated documentation forms for MedsCheck consultations, OPA and the Ministry engaged in regular meetings through the Council to examine, evaluate and, if necessary, amend the program to address:

- the quality of pharmacist/patient consultations,
- the quality of documentation for the Ministry and other healthcare providers (e.g., physicians), and
- the optimization and streamlining of implementation for pharmacy professionals and pharmacy business operators.

These were the mutual goals of both OPA and the Ministry, and productive discussions continued to evolve over this nine-year period that aimed to strengthen this valuable service for all stakeholders.

In the summer of 2016, at the OPA Annual Conference, Association staff were advised that the Pharmacy Council would be sunsetted and, notwithstanding the legislative language in the ODBA that still exists to this day, meetings of the Council would cease. In the fall of 2016, a revised MedsCheck program was relaunched, complete with new documentation forms that were intended to standardize the look and feel for pharmacists, patients and other healthcare professionals. The new forms also would serve as an easier mechanism for purposes of Ministry audits of the service.

¹ Ontario Drug Benefit Act, R.S.O. 1990, Ch. O.10. Accessed via [e-laws website](#) on September 2, 2020.

Preamble

The impetus for the creation of new documentation forms for the MedsCheck Program was to generate increased quality and data capture of the pharmacist/patient consultation as well as to drive consistency and clarity in the program's outputs for patients, other pharmacists and physicians. With the 2007 launch of MedsCheck, OPA developed optional documentation and communication templates to assist and support the profession with implementation. While many pharmacies took advantage of these templates, some pharmacy operators opted to generate their own documentation forms that allowed for integration of their corporate logos and the look and feel they wanted for their pharmacy staff and for their patients.

While not intended, variations in the documentation templates across the Ontario pharmacy marketplace led to some confusion, particularly with physicians. This led to the recommendation within Pharmacy Council that form standardization might be warranted. OPA concurred with this feedback and agreed to work with Ministry staff and a subgroup of the Pharmacy Council to draft new standardized forms for the program.

There was significant discussion that went into the creation of the new proposed forms, particularly on the clinical aspects that needed to be captured. It was, however, articulated that the forms needed to be integrated into each pharmacy professional management system ('PPMS') so that the significantly increased degree of documentation would be seamless and streamlined. This was a critical consideration for OPA in its discussions with the Ministry and the Pharmacy Council as the other elements of the program (e.g., the funding model and the expected 20- to 30-minute duration of a consultation) remained unchanged.

Ultimately, while the Pharmacy Council ultimately agreed on the content of the new forms, the layout of those forms were a different matter, and the finalized content was left to programmers and forms developers to incorporate all of the new information into a layout that fit an 8½" x 11" sheet of paper and complied with guidelines and requirements set out in the *Accessibility for Ontarians with Disabilities Act, 2005* ('AODA'). The result was that the new and comprehensive forms for the revised MedsCheck program were complete from a content perspective but did not accommodate the highly unique and individualized approaches to a pharmacist/patient dialogue.

Pharmacy software vendors are either stand-alone companies or proprietary divisions within a larger pharmacy organization that are in the business of developing and updating pharmacy software in accordance with industry standards as well as optimizing pharmacy operations. Pharmacy software development includes prescription filling capabilities, provision of professional pharmacy services, on-line adjudication of prescription claims to insurance companies, inventory and financial management as well as accommodating recordkeeping, documentation and report / label generating. As the needs of pharmacy professionals, patients, prescribers and public and private payors continue to evolve, PSVs have been exceptionally active to help meet these needs, whether that is driven by a new service within the current scope of practice, to accommodate an expanded scope of practice, or in response to new or revised regulations or health policies that may be provincial or national in nature.

While most, if not all, PSVs are Ontario-based, their service offerings are national in nature and each PSV will adapt their software, as deemed necessary to meet the regulatory and business requirements of the province in question. With their full suite of services, PSVs are focused to give pharmacies and pharmacists what they need to enhance patient care and customer experience. As such, all PSVs will agree that it is imperative to address seamlessness in the software.

Pharmacists and pharmacy owners rely on their PSV to incorporate the most recent standards and as with any software, there will be routine updates for program users to make the system run more efficiently. Pharmacists and pharmacy owners do not need to ‘download’ or ‘install’ updates, they happen automatically as PSVs make updates to their software.

PSVs routinely plan software updates for their pharmacy clients based on priorities. For example, such updates are often seen with new policies and regulations that result from changes in scope of practice and the requirements associated with the implementation of new pharmacy services. It is imperative that PSVs are regularly updating their systems to accommodate these changes as quickly as possible so that their pharmacy clients are able to meet patient needs and expectations

In Ontario, one of the pharmacy software updates required was to incorporate the Ministry requirements of the MedsCheck forms within the pharmacy software. When the mandatory forms were introduced in October 2016, PSVs began the in-depth step by step planning of incorporating the required fields of the forms as part of their routine pharmacy software updates. This was a complex process due to the lack in flexibility of allowing PSVs to design software enhancements to incorporate the forms to fit the unique workflow based on the rigid requirements of incorporating the forms as provided by the Ministry. The ultimate result was the need for PSVs to incorporate other third-party solutions to effectively manage the process. This took time and considerable resources.

Part 1: Compliance by PSVs in Incorporating MedsCheck Requirements to Software

Over the past several years, the Ontario Pharmacists Association has convened a group of eHealth experts and PSV representatives in its eHealth/Pharmacy Professional Management System Task Force (the ‘Task Force’) that meets regular and on an ad hoc basis to discuss matters of relevance to the profession and the business of pharmacy. As an attachment to this letter, you will find the listing of the members of OPA’s Task Force for 2020-21 along with each vendor’s individualized response from each PSV back to OPA relating to the specific question asked by the Ministry. In addition, you will also find an attachment with a consolidated response from OPA to the Ministry, along with confirmation of receipt of that transmission.

It is a relatively small marketplace for PSVs, and so it is important to note that while the major PSVs are represented on this Task Force, its composition is not exhaustive. Included in this attachment are the individual responses to an emailed request to the Task Force relating to their level of compliance with incorporation of the MedsCheck requirements into their software. The process followed for receipt of this information was an email to the group but with a request for individual responses back to OPA in order to protect against any undesired sharing of proprietary information. Accordingly, there is some non-relevant information that has been redacted from the emails provided here.

OPA and the Ministry maintain a good relationship in terms of securing PSV input into matters. Should the ministry need to communicate with the PSVs, it is accomplished through outreach to OPA and its Task Force that the Ministry would extend its requests and communication.

Insofar as software updates do not need to be downloaded by pharmacies (installation is automatic with routine PSV updates with its member pharmacies), confirmation from PSVs’ incorporation of the MedsCheck forms can be considered as confirmation that the pharmacies have access to these

forms for implementation. However, it is critical for the Office of the Auditor General of Ontario to understand that access to the forms does not imply easy or streamlined access.

It is important to note that the Ministry continues to audit the MedsCheck Program and the forms used. As reimbursement to pharmacies is based on completion of the forms in the exact format provided by the Ministry, the fact that OPA is unaware of any issues being raised to PSVs related to invalid forms or formats from the pharmacies they provide services to provides additional confirmation that the forms are in place and are compliant.

Part 2: Administrative Outcome for Pharmacists

The incorporation of the MedsCheck form requirements within the pharmacy software systems has certainly standardized the look and feel as it was planned through Pharmacy Council. However, the due to the mandated and rigid nature of the forms, there were significant challenges for frontline professionals to follow the flow of the forms as the feedback from pharmacists was that they did not allow for a personalized discussion with their patients. Furthermore, because of the inability for PSVs to deviate from the layout of the forms, they were unable to address the needs of either the pharmacists or their patients in a manner that ensured a smooth implementation.

It should be stated that there was significant time, effort and cost by PSVs to enable some auto-population of fields, and that did help in some ways to streamline certain aspects of the forms. However, the clinical flow and the flexibility desired by pharmacists was missing. To that end, OPA is very eager to resume discussions with the Ministry of Health via a formalized table. Through continued collaboration between the Ministry and OPA, we hope to be better able to monitor and evaluate the MedsCheck Program moving forward, along with other professional services and expansions of scope of practice so that the patients of Ontario are receiving the best possible care from pharmacists, other health providers are being informed of the services pharmacists are providing, and the Ministry is achieving value for the money invested in these pharmacy services.

OPA appreciates the opportunity to provide this clarity and background to the MedsCheck Program, and remains at the disposal of the OAGO and the Ministry for more feedback as desired. I can be reached at your convenience at amalek@opatoday.com or by phone at 416-949-0788.

Respectfully submitted,



Allan H. Malek
EVP and Chief Pharmacy Officer

cc: Justin J. Bates, CEO, Ontario Pharmacists Association
Jen Baker, Chair, Board of Directors, Ontario Pharmacists Association
Deb Saltmarche, Chair, OPA eHealth/PPMS Task Force 2020-21
Angie Wong, Director, Drug Programs Policy and Strategy Branch, Ministry of Health

Attachments:

- Consolidation of PSV Responses and Confirmation of Transmission to MOH
- OPA PSV Task Force Members and Individualized Email Responses