



ONTARIO
PHARMACISTS
ASSOCIATION

Office of the Chief Executive Officer

December 30, 2020

Ministry of Long-Term Care
400 University Ave.
Toronto, ON M7A 1T7

Dear Minister Fullerton,

Re: Role of Long-Term Care Pharmacy

COVID-19 has had a devastating impact on the long-term care (LTC) sector in Ontario.

On behalf of Ontario's more than 20,000 pharmacy professionals, we support the commitment of your government to establish a Commission of Inquiry into LTC homes to better understand the impact of the pandemic on long-term care residents. As essential healthcare workers who continue to provide services on the frontline through this crisis, we are committed to supporting the government to improve the quality and delivery of care for residents in LTC homes.

The crisis has highlighted inadequacies and challenges in the LTC system that are largely a result of both action and inaction of many governments over the past. Over the years, successive changes in policy and government direction has directly and indirectly reduced LTC funding negatively impacting resident care, while increasing the burden on already over-worked staff.

Our primary priority is to ensure the health and well-being of long-term care residents, who are among the most vulnerable in the province specifically during this current global pandemic.

Pharmacists in Long-Term Care

Pharmacists play an important role as part of the resident care team in LTC homes. With more than 500 pharmacists working daily in LTC homes, pharmacy operators provide specialized care to over 100,000 seniors annually. We partner with LTC administration and staff to ensure the health and safety of vulnerable seniors is protected and that medication management systems are safe and efficient to reduce the burden on other health care workers in homes (specifically PSWs and nurses).

The role of pharmacists in LTC is specialized and under a separate regulatory environment that has undergone significant pressures over the last several years. LTC pharmacy operators dispense, deliver and monitor each resident's medications in a model designed for those seniors who cannot self-administer or monitor their own health. This care is integrated within the care provided in the LTC home and includes 24/7 medication administration process for every resident, where resident typically take an average of 8-12 prescriptions per person. Virtually the entire LTC pharmacy business is based on ODB prescription fulfillment and provided government supply – there is no cross-subsidization from retail.



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In addition to dispensing, delivering and monitoring residents' medications, the pharmacy service complements the nursing team and home physician(s) to ensure optimal health outcomes from medication therapy, provide a safe and secure supply of medications, drive continuous quality improvement in the medication management system, medication reconciliation, minimize nursing time spent to manage and administer medications to residents and educate home staff of medication use, outcomes, safety. These partnership between LTC pharmacists and the other health care providers at the LTC home is critical to ensure quality care for all residents.

COVID-19 Impacts on LTC Homes

The residents of our LTC homes require the full care, and protection, the health care system can provide which includes the strength of an interdisciplinary care team. The pandemic has further demonstrated this need. This includes pharmacy professionals working in LTC, not only to provide direct care and support to patients but also to support other members of the care team including nurses and PSWs.

Throughout the pandemic pharmacists, like many other health professionals, have gone above and beyond to support patient care. Pharmacists developed and implemented a COVID-19 Incident Management Plan across a number of homes. In addition, pharmacy professionals took on expanded roles including, but not limited to, provision of personal protective equipment for LTC staff, contactless delivery processes, critical supply inventory support, operating on extended hours, enhanced infection, prevention, and control measures, and ensuring continuity of care for all patients.

Ontario pharmacists have proven throughout this pandemic that they are dedicated to providing high quality care for LTC residents at all times. Pharmacists have, and continue to be, critical in the response to COVID-19 in our LTC homes and will continue to be central in implementing any future improvements and recommendations coming from the learnings of the COVID-19 pandemic. To enable pharmacists to provide the critical patient care and support to LTC staff, it is critical the Ontario government continue and enhance support for pharmacists in LTC.

Our Recommendations

Although the COVID-19 pandemic is unprecedented and one could never have predicted the devastating impact it has had on long-term care homes across the country and province, we have found the pandemic has exasperated previously existing areas for improvement that existed prior to the pandemic. In July, 2019 the Honourable Eileen E. Gillese, Commissioner of the Long-Term Care Homes Public Inquiry, issued a final report and recommendations for LTC, which included a number of recommendations which we believe are still relevant and even more important in the current context to ensure significant system benefits for more on-site clinical pharmacist support, enhanced education of the medication management system for home staff and provision of technologies to improve nursing staff efficiency and medication security.



Recommendation One: Reinstate the long-term care MedsCheck Program

The MedsCheck Program is a longstanding medication program in Ontario to help ensure the medication safety and compliance by providing a one-to-one interview between the pharmacist and the individual. This program is particularly helpful for seniors with complex care needs and for patients who take multiple medications as the review encourages patients to better understand their medication therapy and help to ensure their medications are taken as prescribed and that patients are getting the most benefit from their medications.

In LTC, the MedsCheck program can improve resident medication safety by increasing direct pharmacist contributions to ongoing medication management assessments, drive active participation of pharmacist at the home in partnership with the care team, increase use of med pass compression and deprescribing and support safe medication dispensing and compliance and enhance overall patient care. This enhanced pharmacist interaction with the care team will continue to support alleviating workload from PSWs and nurses who are overburdened now, more than ever with patient care.

Recommendation Two: Implement a pharmacist led medication reconciliation for long term care home admissions and transfers of care

Medication histories and medication orders are complex and time consuming. Pharmacist led “MedRec” upon admission has shown to increase nursing efficiencies, decrease adverse events, and result in health system savings where medication discontinuations are appropriate.

The proactive medication reconciliation by a qualified pharmacist upon admission to an LTC home can ensure that each patient’s care plan includes the medication they need to stay healthy, safely discontinue unnecessary prescriptions, identify missing medications immediately, and ensure all members of the resident’s care team are aware of the residents medication needs to support and individualized care plan. Other care professionals, such as nurses and PSWs, do not have the same degree of medication training, or the time, to adequately complete this process.

We recommend an amendment to the Policy for Pharmacy Payments under the Long-Term Care Home Capitation Funding Model, to support this activity being completed by a qualified pharmacist to deliver these benefits in Ontario’s LTC homes.

Recommendation Three: Pause the planned reduction of the current capitation model threshold to maintain funding at \$1,500 per bed

One of the more recent government decisions that, we believe, has contributed to diminished level of care for residents of LTC homes was the introduction of a capitation model for LTC pharmacy reimbursement on January 1, 2020. This decision resulted in drastic cuts in funding, approaching 50% when fully implemented.



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Consequently, clinical pharmacy consulting services which had been provided in homes by LTC pharmacy professionals, without any direct compensation by government, necessarily had to be reduced. This placed additional burdens on nurses in LTC homes and required them to take on tasks such as medication reconciliation. This burden was greatly exacerbated with the arrival of COVID-19 in Ontario a few short months after the January 1 implementation date.

In the recommendations of the Long-Term Care Homes Public Inquiry last summer, Justice Gillese called for substantial new funding for pharmacy services and an expanded role for pharmacists in LTC homes to keep our seniors safe. The recent changes that we have outlined directly contradict the recommendations made by the expert inquiry.

LTC home operators have urged the government to reverse or at least freeze the funding cuts for pharmacy while they deal with the extraordinary impact of the COVID-19 pandemic and await the findings of the LTC Commission. We strongly agree.

Recommendation Four: Implement technology to support enhancements to the safety and efficiency of the medication system

Through the COVID-19 pandemic we have seen an increase openness to digital and virtual solutions across the health care system and the LTC sector should not be the exception. Using technology to support medication reconciliation and prescribing can be more efficient than paper-based processes and also enable enhanced information sharing between the care team including a primary care provider. Providing digital tools decreases time wasted tracking down paper prescriptions and confirming orders with physicians. This will be central to a well-executed COVID-19 vaccine administration and maintenance program across all LTC homes in Ontario.

Other technology supports, such as online tracking and education for all LTC staff, will also improve medication literacy and awareness of the entire care team resulting in increased patient safety. Investment in enhanced medication storage cabinet will make medication protection and dispensing more efficient.

This government has made a commitment to improve the digital infrastructure of Ontario's health care system and we are recommending some of these investments be made in LTC to support medication management.

Recommendation Five: Expand pharmacists' scope of practice to enable pharmacists to assess and, if necessary, prescribe within a publicly funded common ailments program for all Ontarians

In an effort to fully realize the benefits of interdisciplinary care, we are recommended all relevant legislation and regulation, including the Long-Term Care Homes Act, be amended to remove barriers to an increased scope of practice for pharmacists.

It has long been evident that with modest expansion of their scope of practice, pharmacists could relieve significant burdens on the healthcare system.



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Pharmacists are the medication experts in a patient's or resident's circle of care and are highly trained to provide additional services to patients, including the assessment and treatment of common ailments, providing immunizations/vaccinations, making therapeutic substitutions and undertaking emergency prescribing for chronic medications. The requirements for COVID-19 testing will continue in LTC for many months to come. With an expansion in the scope of practice for pharmacists, they can be a key resource in this process to ensure the safety of staff and residents. In addition, the provision of COVID-19 vaccines is sure to be a trying process across all LTC homes in the province. More than 500 pharmacists are already connected to or are working directly in LTC homes serving residents directly. These pharmacists have provided flu vaccines in previous years and are qualified to administer the COVID-19 vaccine as well.

We recommend the government revisit the scope of practice for all pharmacists, especially those in LTC, to ensure they are able to act to their fullest capacity as a member of the care team.

Next steps

Pharmacists are well positioned to help improve the quality and delivery of care to residents and to reduce pressures on doctors and nurses in LTC homes. This is especially true amidst staffing and recruitment challenges in LTC that make it difficult for homes to maintain adequate levels of staffing. Pharmacists will be critical partners in the continued provision of COVID-19 testing and vaccines in the months to come and will be an important component in the next stages of LTC recovery following the pandemic.

We look forward to the opportunity to meet with you to discuss these recommendations further and how Ontario's pharmacists can help support improved care for long-term care residents.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin J. Bates".

Justin J. Bates
Chief Executive Officer

cc: The Honourable Christine Elliott, Minister of Health and Deputy Premier