



ONTARIO  
PHARMACISTS  
ASSOCIATION

## Office of the Chief Executive Officer

December 22, 2021

Mr. Patrick Dicerni  
Assistant Deputy Minister and Executive Officer  
Drugs and Devices Division  
Ministry of Health  
438 University Avenue, 10<sup>th</sup> Floor  
Toronto ON M7A 1N3

RE: COVID-19 Vaccine Fee Follow-up Letter

Dear Patrick,

In follow-up to our discussions on the provincial pharmacy reimbursement fee for administration of publicly funded COVID-19 vaccines, we are sharing some additional information to support the proposal to increase the current \$13 fee to \$16. This proposal is supported by reviewing the actual cost of delivering the program and in recognition of the significant challenges associated with the vaccine rollout. Pharmacy professionals continue to be proud of the effort to help protect their communities by administering over 5.5M doses and will continue to step up to get the job done with third shots and beyond. Pharmacy professionals are an integral part of the effort to protect public health during the pandemic.

While we appreciate that the current fee was negotiated prior to the launch of the campaign, and without direct knowledge of the administrative burden, we believe it is important for government to send a strong signal to pharmacy professionals in support of the ongoing efforts underway to vaccinate Ontarians. Several key elements have changed since the initial fee discussions transpired including but not limited to the labour burden on pharmacy to manage the increased patient load, security, logistics, and documentation. The average pharmacy spends over 1.5 hours a day just on billing and managing the data entry to COVAXon, scheduling and other documentation requirements.

- The current phase of the pandemic focuses more on pharmacy than in early 2021. The demands have increased on pharmacies and pharmacists especially since September 2021.
- The pandemic has taken a mental health toll on the profession as they endure longer hours, no days off, while managing the operations for medication management and delivering other clinical services.
- Other provinces have provided a top up fee and Ontario is among the lowest in reimbursement fee for providing the same service.

The increase in fee will provide the opportunity to better support and further enable this sector who has been a partner with government in contributing significantly to the vaccine roll-out.

To better understand pharmacy costs associated with pharmacy vaccination programs, the Ontario Pharmacists Association (OPA) conducted a time and motion survey specifically examining costs related to the administration of COVID-19 and influenza vaccines in Ontario pharmacies.

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The survey was open from August 5, 2021 to August 31, 2021, and pharmacy professionals (i.e., pharmacists, technicians, interns, students and assistants) who were participating in the COVID-19 immunization and/or influenza immunization programs through Ontario community pharmacies were invited to respond. During the survey period, 711 responses were received from pharmacy professionals and the attached provides a summary of the findings which include:

- 86% indicating that the provincial reimbursement fee at \$13 is not sufficient
- 61% of owners indicating that the program has an overall net negative financial impact
- Inadequate remuneration was one of the top three reasons cited for not participating in the program

Furthermore, in considering other provincial remuneration models for COVID-19 vaccinations, as per the OHIP fee schedule, for COVID-19 vaccination events not coordinated by a hospital or PHU, primary care providers and specialists are able to submit a claim for \$13.00 (fee code G593) and when the visit is for the sole purpose of immunization a claim for \$5.60 (fee code G700 or Q593). In addition, if the primary care provider does not actually administer the injection but helped patients to make arrangements, a claim for \$6.00 (one-time fee code Q007) can be submitted which includes contacting patient to assist with registering and/or booking their COVID-19 vaccination appointment or provide direct assistance to complete patient consent or other documentation, and counselling codes can be billed regardless of who administers the vaccine.

Lastly, in considering pharmacy remuneration for COVID-19 vaccinations across Canada, the following provides a summary of fees.

Province	COVID-19 Vaccine Fee
British Columbia	\$18 fee (includes \$5.90 supplement to offset costs) - \$4 top up fee to \$22
Alberta	\$25 fee (weekdays); \$35 weekends and holidays
Saskatchewan	\$20
Manitoba	\$20
Ontario	\$13
Quebec	\$17.10 (includes \$5.50 offset for PPE and sanitary measures)
New Brunswick	\$15 (includes \$2 offset for admin costs)
Nova Scotia	\$16



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PEI	\$15 (includes \$2 supplement to offset costs)
Newfoundland & Labrador	\$13
<b>AVERAGE FEE</b>	<b>\$17.71</b>

OPA maintains that the originally proposed COVID-19 vaccination fee of \$16 represents a fair and reasonable rate that reflects pharmacy costs including the significant costs associated with activities to support this program beyond the actual vaccination event such as but not limited to inventory management, appointment scheduling, and addressing questions from the public related to eligibility and vaccine hesitancy. Accompanying this letter is the detailed breakdown of the analysis supporting the top up fee proposal.

We are proposing the top up fee to better support pharmacy professionals and ensure that the fee reflects the actual costs. Based on the current challenges and costs associated with delivering the program, we believe a \$3 top up fee is warranted. OPA welcomes the opportunity to further discuss the current COVID-19 vaccination remuneration fee to Ontario pharmacies and look forward to continuing to play a significant role in supporting the government's COVID-19 vaccination efforts.

Sincerely,

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

Justin J. Bates  
Chief Executive Officer

cc: Angeline Ng, Vice President, Professional Affairs, Ontario Pharmacists Association  
Tim Brady, Chair, Board of Directors, Ontario Pharmacists Association  
Angie Wong, Director, Drug Programs Policy and Strategy Branch - OHIP, Pharmaceuticals and Devices Division | Ministry of Health