

UPDATED Executive Officer Notice: Ontario Naloxone Program for Pharmacies

Effective February 9, 2024

This is an update to an earlier EO notice dated April 27, 2018.

This notice is to provide information on updates to the Ontario Naloxone Program for Pharmacies (the “ONPP”).

This Executive Officer (“EO”) Notice and the accompanying Questions and Answers (“Qs and As”) set out the terms and conditions for a participating pharmacy’s submission of claims for payment under the ONPP. Each document is a ministry policy that pharmacy operators must comply with under section 3.2. of the HNS Subscription Agreement for Pharmacy Operators.

Only Part A pharmacists, registered pharmacy interns, and pharmacy students (under the supervision of a pharmacist), can provide publicly funded naloxone kits to eligible individuals at participating pharmacies.

Prior to providing naloxone kits to eligible individuals, pharmacies must ensure that their pharmacy staff are trained to provide the necessary training to eligible persons who are to receive the naloxone kits.

Overview of Changes

Effective February 9, 2024, updates to the ONPP include:

- Clarifying that the provision of naloxone kits under ONPP must occur ^{#1} on-site at the physical premises of the pharmacy and that training for eligible individuals receiving a kit on how to use it must be provided on an individual basis, in-^{#2} ^{#3} person, and not in group settings; ^{#4}
- Clarifying pharmacy documentation requirements related to claims for naloxone distribution.

Background

On June 3, 2016, the Ministry of Health (the “ministry”), introduced the ONPP, making publicly funded injectable naloxone kits available in pharmacies.

As of June 24, 2016, naloxone hydrochloride moved to Schedule II in the NAPRA's National Drug Schedule (NDS) and no longer requires a prescription to be dispensed in pharmacies if indicated for emergency use for opioid overdose outside of a hospital setting.

On March 27, 2018, intra-nasal naloxone spray (INNS) was added to the ONPP for all eligible recipients and, in limited circumstances, pharmacists may:

- Provide naloxone kits to Ontarians who do not have an Ontario health card or to those who do not wish to provide identification; and
- Provide up to two naloxone kits to an eligible recipient at one time.

Pharmacy Eligibility

To be eligible to submit claims under the ONPP, a pharmacy operator (also referred to in this document as a “participating pharmacy”) must meet the following requirements:

- Have a valid HNS Subscription Agreement with the ministry; and
- Provide naloxone kits within the physical premises of the pharmacy

Pharmacists are expected to use their professional judgement when distributing naloxone kits and providing training as appropriate.

Even for replacement kits? Or only for initial kits provided with first-time training? It makes no sense that we can't deliver replacement kits.

Recipient Eligibility

The following individuals may receive eligible services (defined below) under the ONPP from participating pharmacies (“eligible individuals”):

- an individual who is either at-risk of currently using opioids, or is a past opioid user at-risk of returning to opioid use, or
- a family member or friend, or other person in a position to assist, an at-risk individual described above.

The individual does not need to be insured under the Ontario Health Insurance Plan (OHIP) or a recipient of the Ontario Drug Benefit (ODB) program.

Eligible Services

Subject to the Exclusions and Restrictions below, a participating pharmacy may provide the following services (“eligible services”) to eligible individuals at the physical premises of the pharmacy.

- up to 2 naloxone kits (i.e., 4 doses) per day, along with appropriate training on how to use the kits.

There is no cost to eligible individuals who receive eligible services under the ONPP.

Naloxone Kits Contents

The ministry does **not** procure naloxone kits and/or supplies for participating pharmacies.

Participating pharmacies can procure pre-made naloxone kits and/or the required supplies to assemble the naloxone kits (i.e., injectable and intra-nasal spray) from their usual pharmacy suppliers and/or distributors.

For pharmacy-assembled naloxone kits, these shall be assembled by a Part A pharmacist, or a pharmacy staff member under the supervision of a Part A pharmacist. Appendix A to this EO Notice lists the required items in a naloxone kit, with each kit containing 2 doses of naloxone.

The Ontario Pharmacists Association (OPA) has developed resources relating to naloxone kits, including a listing of kit contents (<https://opatoday.com/naloxone-kit-supplies-list>), on their website at <https://opatoday.com/naloxone>.

Billing Procedure

Pharmacies must submit claims for payment using the individual's valid Ontario health card number (if available), on the same day the naloxone kit(s) and training are provided.

If the eligible individual is an **ODB program recipient**:

- Intervention code 'PS': (Professional Care Services)
- Product Identification Number (PIN): see Table 1 below for list of PINs
- Valid Pharmacist ID

If the eligible individual is **not** an **ODB program recipient** and has an Ontario health number:

- Patient Gender: 'F' = female; 'M' = male
- Patient Date of Birth: Valid YYYYMMDD
- Patient's Ontario Health number
- Intervention codes:
 - PS: Professional Care Services
 - ML: Established eligibility coverage (i.e., 1 day of the Plan 'S' coverage)
- Carrier ID: 'S'

- Product Identification Number (PIN): see Table 1 below for list of PINs
- Valid Pharmacist ID

If the eligible individual is **not** an ODB program recipient and does **not** have an Ontario health number, pharmacists must submit claims using a Proxy ID for payment:

- First Name: HARM
 - Last Name: REDUCTION
 - Patient Gender: ‘F’ = female; ‘M’ = male; (or) Blank
 - Patient Date of Birth: Valid YYYYMMDD (if known) or 20000101
 - Proxy patient ID: 89999 999 91
 - Intervention codes:
 - PS: Professional Care Services
 - PB: Name entered is consistent with card
 - Product Identification Number (PIN): see Table 1 below for list of PINs
 - Valid Pharmacist ID
- A valid Pharmacist ID is required in the prescriber field for all claim submission, this is the license number of the Part A pharmacist who provides or supervises the provision of naloxone kits.
 - **Table 1** lists the claim submission PINs and the total amount payable for naloxone kits provided to each eligible individuals by participating pharmacies. The amount associated with each PIN is payment for providing the kit(s) and providing training on how to use the kit(s).
 - A maximum of **two (2) naloxone kits (i.e., total 4 doses)** may be provided to an eligible individual per day and submitted as a single claim for payment.

Table 1: Naloxone kits funded under the ONPP

PIN	Naloxone Kit Type and Description	Total Amount Paid
93877251	One Injectable Kit <ul style="list-style-type: none"> • \$35 – cost of one kit • \$10 – professional fee • \$25 – training fee 	\$70
93877252	One Injectable Kit (replacement kit with no training) <ul style="list-style-type: none"> • \$35 – cost of one kit • \$10 – professional fee 	\$45
93877257	Two Injectable Kits (one initial and one replacement kit with one professional fee only) <ul style="list-style-type: none"> • \$70 – cost of two kits • \$10 – professional fee • \$25 – training fee 	\$105

PIN	Naloxone Kit Type and Description	Total Amount Paid
93877258	Two Injectable Kits (two replacement kits with one professional fee only) <ul style="list-style-type: none"> • \$70 – cost of two kits • \$10 – professional fee 	\$80
93877255	One Intra-Nasal Kit <ul style="list-style-type: none"> • \$110 – cost of one kit • \$10 – professional fee 	\$120
93877256	Two Intra-Nasal Kits (one professional fee only) <ul style="list-style-type: none"> • \$220 – cost of two kits • \$10 – professional fee 	\$230

Notes

- **Do not** use the Drug Identification Number (DIN) of the naloxone product that is contained in the naloxone kit.

Pharmacy documentation requirements

Pharmacists, pharmacy staff and pharmacies shall keep records consistent with their obligations under the *Pharmacy Act, 1991*, the *Drug and Pharmacies Regulation Act*, and any instructions or guidelines provided by the OCP or the ministry.

For purposes of post-payment verification, pharmacy records related to claims for naloxone distribution must be maintained in a readily available format for the purpose of ministry inspection for a minimum of 10 years from the last recorded 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.

For every naloxone kit distributed to eligible individuals and submitted for payment to the ministry, participating pharmacies must keep a record of:

- Name, date of birth, and address of recipient *This contradicts the previous section.*
- Ontario health number of recipient, if available, OR indication of a non-identified person (i.e., no health card or did not want to provide one)
- Type of naloxone kit(s) provided and details of any training provided
- Name of pharmacy, physical pharmacy address, signature of authorized pharmacy staff who provided the naloxone kit
- Date of service

Exclusions and Restrictions under the ONPP

- Naloxone kits must be provided to eligible individuals from the physical premises of the pharmacy location. This requirement does not apply if the eligible individual is unable to physically attend the pharmacy and instead requires the naloxone kit to be delivered to them because they are home-bound, a resident of a long-term care home, or resident in a congregate setting, such as a retirement home.
- The following are **not** eligible for payment under the ONPP:
 - Naloxone kits provided to businesses and/or organizations
 - Naloxone kits provided by in-patient hospital pharmacies
 - Claims for one (single) naloxone kit (injectable PIN 93877251 or PIN 93877252, or intra-nasal spray PIN 93877255) submitted twice in a day for an eligible person as two kits
 - Paper claims for providing publicly funded naloxone kits unless 3 intervention codes are required in order to process the claim
 - Paper claims for providing publicly funded naloxone kits over the daily claim limit (see above). Only the cost of the kit (without professional fee) is eligible payment for residents of long-term care homes.
- Recommendation for, and/or provision, of naloxone kits is not eligible for claiming a professional service fee under the Pharmaceutical Opinion Program.
- Overpayments due to inappropriate claim submissions are subject to recovery.

This is prejudicial. What about people in shelters? What about freedom to choose your provider? Why virtual now banned?

Neither the ONP nor the WNP come anywhere near replacing the need we currently fulfil. The WNP requires only one person at a workplace. The ONP is a notoriously unreliable supplier, and training is far below what we provide as pharmacists.

Additional Information:

For pharmacy billing:

Please call ODB Pharmacy Help Desk at: 1-800-668-6641

For inquiries relating to ONPP:

Please email the ministry at: PublicDrugPrgrms.moh@ontario.ca

For Ministry webpages relating to naloxone:

Please access this [website](#)

For all other Health Care Providers and the Public:

Please call ServiceOntario, Infoline at 1-866-532-3161 TTY 1-800-387-5559. In Toronto, TTY 416-327-4282.

APPENDIX A:

Contents of the naloxone kits (both injectable and intra-nasal spray) are outlined below.

Each intra-nasal spray naloxone kit **must** include:

- One (1) hard case (preferably, a zippered hard black case with red “naloxone” cross)
- Two (2) doses of 4 mg/0.1 ml naloxone hydrochloride intra-nasal spray naloxone
- One (1) rescue breathing barrier
- One (1) pair of non-latex gloves
- One (1) card that identifies the person trained to give the naloxone
- One (1) updated instructional insert (English and French)

Each injectable naloxone kit **must** include:

- One (1) hard case (preferably, a zippered hard black case with red “naloxone” cross)
- Two (2) 1 ml ampoules or vials of naloxone hydrochloride 0.4 mg/ml injection
- Two (2) safety engineered syringes with 25g one inch (1”) needles attached
- Two (2) alcohol swabs
- Two (2) safe ampoule-opening devices (also known as breakers, snappers, or openers), as applicable
- One (1) rescue breathing barrier
- One (1) pair of non-latex gloves
- One (1) card that identifies the person trained to give the naloxone
- One (1) updated instructional insert (English and French)