

Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies – Frequently Asked Questions

December 12th, 2022 (Updated April 21st, 2023 – see FAQs #4 and #11)

This document accompanies the most recent Executive Officer (EO) Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#).

For more information:

- refer to the ministry website for [COVID-19 antiviral treatments](#) in Ontario
- refer to the Ontario College of Pharmacists (OCP) for [guidance](#) on prescribing Paxlovid™
- refer to the [Ontario Drug Programs Reference Manual](#) and contact the ministry's Ontario Drug Benefit (ODB) Help Desk for Health Network System claims issues

This document is not intended to provide or take the place of medical advice, diagnosis or treatment, or legal advice.

Overview

1. How do pharmacies participate in prescribing publicly funded Paxlovid™ for COVID-19?

Any pharmacy with a Health Network System (HNS) account and billing privileges under the *Ontario Drug Benefit Act* is eligible to participate in pharmacist prescribing of publicly funded Paxlovid™. It is up to each eligible pharmacy / pharmacist to decide whether it will participate in this publicly funded initiative.

Part A pharmacists are authorized to prescribe the oral antiviral treatment for COVID-19, Paxlovid™ (nirmatrelvir/ritonavir) in accordance with Ontario Regulation 107/96 under the *Regulated Health Professions Act, 1991* (RHPA).

2. Are all Ontario pharmacists, interns, and students able to prescribe and/or dispense publicly funded Paxlovid™ to eligible patients?

All pharmacies with the HNS account and valid HNS Subscription Agreement are eligible to submit claims for providing publicly funded prescribing and/or dispensing services related to Paxlovid™ for eligible individuals. Paxlovid™ must be prescribed and/or dispensed in accordance with the Ontario College of Pharmacists [Standards of Practice](#) as well as relevant [guidance](#) including Initiating, Adapting and Renewing Prescriptions.

Prescribing: Only Part A pharmacists who comply with O. Reg. 107/96 under the *Regulated Health Professions Act, 1991* and who have the appropriate knowledge, skills, and competencies may prescribe Paxlovid™. No other member of the Ontario College of Pharmacists (i.e., Part B pharmacist, registered pharmacy student, intern, pharmacy technician, pharmacist (emergency assignment), and pharmacy technician (emergency assignment)) is authorized to prescribe Paxlovid™.

Pharmacists must be able to gather and document all relevant information about eligible individuals, review their medical and drug history, determine the appropriate treatment plan based on any contraindications and drug interactions, if applicable, notify the primary care provider and follow-up with the individual to monitor treatment progress and report any adverse events.

Dispensing: Paxlovid™ is a prescription medication and as such can be dispensed by any Part A pharmacist (or registered pharmacy student or intern under the supervision of a pharmacist) in Ontario, pursuant to a valid prescription.

(Note: Pharmacists (emergency assignment or EA) are able to practise to the full scope of their certificate of registration and must be supervised by a Part A pharmacist.)

Pharmacists must ensure they have sufficient knowledge, skills and expertise when dispensing any medication, including Paxlovid™. Pharmacists are reminded that every prescription must be reviewed for completeness and appropriateness, and to review an individual's personal health information for drug therapy problems, drug interactions, therapeutic duplications and any other potential problems.

You may refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for detailed information on documentation.

3. How will the public know which pharmacists are prescribing and/or dispensing publicly funded Paxlovid™ for COVID-19?

Only pharmacies with the HNS account and billing privileges under the *Ontario Drug Benefit Act* are eligible to offer services related to prescribing and/or dispensing publicly funded Paxlovid™. It is up to each eligible pharmacy to decide whether to participate in these publicly funded initiatives.

The public may wish to contact their local pharmacy to ask if prescribing services from a pharmacist are available and/or if supply of publicly funded Paxlovid™ is available for dispensing pursuant to a prescription.

4. How do pharmacies obtain supply of publicly funded Paxlovid™?

Pharmacies can order publicly funded Paxlovid™ (at no cost) through participating pharmaceutical distributors (Shoppers Drug Mart or McKesson). Pharmacies should contact a participating pharmaceutical distributor for details on the ordering process.

Please note, on December 1, 2022, Health Canada issued a Notice of Compliance to extend the shelf life of Paxlovid products to 24 months. The extension applies to both the standard dose pack (DIN 02524031) and the moderate renal impairment dose pack (DIN 02527804).

Pharmacists are advised to verify the expiry date on any Paxlovid they dispense and to communicate with patients to avoid confusion or premature disposal of Paxlovid packs whose printed expiry dates have passed.

Detailed information on lot numbers and extended expiry dates for Paxlovid products can be found [here](#).

5. Where can I find clinical information about Paxlovid™?

The following information is available regarding Paxlovid™:

- [Ontario Health Clinical Guidance](#): Recommendations on use and who is at higher risk of severe COVID-19
- Additional [Paxlovid resources](#) available from Ontario Health
- [Paxlovid Product Monograph](#): Full details on interactions and contraindications
- [Nirmatrelvir/Ritonavir \(Paxlovid™\): What Prescribers and Pharmacists Need to Know](#): Key information to help prescribers determine whether Paxlovid™ is right for their patients
- [Paxlovid for Patients on a Direct Oral Anti Coagulant \(DOAC\)](#) Information guide.
- [Liverpool COVID-19 Interactions \(covid19-druginteractions.org\)](#): List of common drug-drug interactions
- [Paxlovid Use in Patients with Advanced Chronic Kidney Disease and Patients on Dialysis with COVID-19](#): Supplemental clinical guidance provided by the Ontario Renal Network (also see [Nirmatrelvir/ritonavir \(Paxlovid\) use in patients on dialysis with COVID-19: Quick reference guide](#)).
- The [Ontario College of Pharmacists](#) and the [Ontario Pharmacists Association](#) may have practice-related resources available.

6. What other procedures must be followed during the COVID-19 pandemic?

Pharmacy professionals should continue to follow the guidelines set out by public health officials. Pharmacies have a shared responsibility for informing and educating the public on COVID-19, including promoting infection prevention and control measures. Resources can be found on the [Ontario College of Pharmacists](#) website as well as [Ministry Guidance at this website](#).

Individual Eligibility

7. Who is eligible to receive a prescription for Paxlovid™ from a pharmacist?

Please refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for information about individual eligibility.

Drug-drug interactions leading to potentially serious and/or life-threatening reactions are possible due to the effects of ritonavir on the hepatic metabolism of certain drugs. Contraindications and interactions must be carefully considered before Paxlovid™ is prescribed and dispensed.

Pharmacists should consider whether the recommended dose of Paxlovid™ should be reduced if an individual has moderate renal impairment. A different dose pack may be dispensed and billed in these situations.

8. Can a prescription for Paxlovid™ be dispensed to a patient without symptoms and positive COVID-19 test (i.e., for travel purposes)?

No. Two of the requirements of dispensing a prescription for publicly funded Paxlovid™ is that the patient has symptoms and a positive COVID-19 test.

9. Do pharmacists have to confirm whether the individual meets the other eligibility criteria to receive publicly funded prescribing and/or dispensing services related to Paxlovid™ (e.g., starting therapy within 5 days of symptom onset, etc.)?

Yes, pharmacists must determine an individual's eligibility to receive publicly funded prescribing and dispensing services related to Paxlovid™ prior to providing the service and before submitting a claim for the service. Please refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for information about individual eligibility, service requirements, and pharmacy documentation requirements.

10. Can pharmacists provide publicly funded prescribing and/or dispensing services related to Paxlovid™ for residents of Long-Term Care Homes?

Professional services, including prescribing services, dispensing services and POP fee related to publicly funded Paxlovid™ are considered under the LTC capitation funding

model and must be provided by the LTC home's contracted primary pharmacy service provider. Pharmacies must submit claims for prescribing or dispensing services related to publicly funded Paxlovid™ with a zero-dollar fee. In emergency situations, secondary pharmacy service providers (i.e., those that do not have a contract with a LTC home) may be reimbursed an applicable fee for prescribing and/or dispensing services related to publicly funded Paxlovid™ to LTC home residents, in accordance with the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#).

11. Can Paxlovid be taken by individuals who are transplant recipients and/or taking immunosuppressants?

Ontario Health is advising that Paxlovid can cause severe interactions with some transplant medications, and solid organ transplant recipients should not take Paxlovid without first speaking to their transplant care team. Solid organ transplant recipients who test positive for COVID-19 should be directed to contact their transplant care team to receive the appropriate COVID-19 therapeutics and follow-up care.

Canadian cases of serious adverse events following a drug-drug interaction between Paxlovid and tacrolimus (an immunosuppressant) have been reported to Health Canada. Tacrolimus is a drug used for the treatment or prevention of organ transplant rejection and the treatment of rheumatoid arthritis. Please refer to Health Canada's March 2023 Health Product [InfoWatch](#) for details on the risk of drug interaction between Paxlovid and immunosuppressants (including cyclosporine, everolimus, sirolimus and tacrolimus).

12. What should pharmacists consider when dispensing a Paxlovid™ prescription from a physician or nurse practitioner?

A valid prescription from a physician or nurse practitioner may be dispensed if there is positive COVID-19 test result and treatment will be started within 5 days of symptom onset.

A physician or nurse practitioner can prescribe Paxlovid™ based on their clinical assessment that an individual is at higher risk of severe COVID-19 (excluding risks due to travel).

Refer to the Individual Eligibility – Dispensing section in the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for more information.

13. Can a prescription for Paxlovid from a physician or nurse practitioner be logged with a pharmacy in advance (i.e., kept on-file or put on hold) if a patient does not have symptoms and a positive COVID-19 test?

Pharmacists are permitted to store or log an unfilled prescription for Paxlovid from a physician or nurse practitioner for future dispensing – similar to how they would log other prescriptions to be put on hold. For Paxlovid, this is encouraged as it can help ensure that patients receive treatment promptly once they have a confirmed COVID-19 infection and fully meet the eligibility criteria. In this scenario, the physician or nurse practitioner is responsible for prescribing Paxlovid while the pharmacist dispenses Paxlovid in accordance with a prescription. Further a pharmacist must conduct a therapeutic assessment when dispensing the ‘unfilled or held’ prescription to ensure the appropriateness of Paxlovid and importantly, that there are no changes to the patients’ health or other medications that would require additional collaboration with the original prescriber as a result of dispensing Paxlovid.

In order for the logged prescription for Paxlovid to be dispensed (i.e., filled) the patient must meet the eligibility criteria for Paxlovid treatment, including having symptoms of COVID-19 and a positive COVID-19 test (rapid antigen or molecular) at the time of dispensing.

Putting a prescription on hold (e.g., in the pharmacy’s computer system) is not the same as dispensing the prescription. The “on hold” service is provided by pharmacists to provide for easy retrieval. They are storing an unfilled prescription for future use by the patient. Pharmacists with questions regarding the difference between dispensing and logging a prescription should consult the Ontario College of Pharmacists.

14. Can a pharmacist dispense Paxlovid™ pursuant to a prescription issued by a health care provider from another province or territory?

Pharmacists must adhere to current legislative requirements as well as OCP Policy regarding out of province / out of country prescriptions.

Pharmacists may accept a prescription from a practitioner registered to practice in any province or territory of Canada if, in their professional judgement, the patient requires the medication to be dispensed by the pharmacy in Ontario.

Pharmacists may not accept a prescription from a practitioner who is not licensed in any jurisdiction in Canada or who is licensed in a Canadian jurisdiction but only practices out of country.

Please refer to the Ontario College of Pharmacists website for more information: [Cross-Jurisdictional Pharmacy Services Policy - OCPIInfo.com](https://www.ocpi.com)

15. Can an individual from another province or country who does not have an Ontario health number receive publicly funded prescription and dispensing services related to Paxlovid™ at a pharmacy?

Yes. A pharmacy may submit a claim for providing publicly funded prescribing and/or dispensing services related to Paxlovid™ for someone **without** an Ontario health number provided they have other valid identification confirming their name and date of birth and they live, work, or study in Ontario or they are visiting Ontario from another province/territory or country, and if they meet the other applicable eligibility criteria.

16. Do pharmacists have to confirm whether the individual has a positive COVID-19 test result prior to prescribing and/or dispensing Paxlovid™? If so, what documentation is required?

Yes. Pharmacists must document that the individual has a positive COVID-19 test result and the date of the test prior to prescribing and/or dispensing Paxlovid™. This can be done by checking the individual's test results in the Ontario Laboratories Information System (OLIS) or by asking the individual to confirm whether they have a positive result. A copy of the test result or documented verbal confirmation from the individual must be obtained and retained for post-payment verification purposes.

17. What type of COVID-19 test result is sufficient to confirm eligibility?

A positive result on any of the following tests is sufficient to confirm COVID-19:

- A rapid point-of-care antigen test administered by either the individual or a health care provider
- ID NOW™ or another point-of-care polymerase chain reaction (PCR) test
- A lab-based PCR test

18. Is there any follow-up required when prescribing and/or dispensing services for Paxlovid™ are provided to an eligible individual?

As with any prescription prescribed or dispensed, pharmacists must follow the OCP [Standards of Practice](#) as well as applicable OCP [guidance](#) for Initiating, Adapting or Renewing Prescriptions, which may require following up with the patient according to their individual needs. Please refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for information.

Claim for payment through the Health Network System

19. How are claims for providing publicly funded prescribing and dispensing services related to Paxlovid™ submitted through the HNS?

Please refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for information.

20. How much does the ministry pay pharmacies for providing prescribing and/or dispensing services related to Paxlovid™?

Prescribing: The ministry will pay the pharmacy a fee of \$19 for prescribing services provided by a Part A pharmacist related to publicly funded Paxlovid™ for an eligible individual, when a claim for payment using the appropriate PIN is submitted through the HNS.

Dispensing: The ministry will pay the pharmacy a fee of \$13.25 for dispensing publicly funded Paxlovid™ for an eligible individual, when a claim for payment using the appropriate PIN is submitted through the HNS.

Professional services, including prescribing services, dispensing services and POP fee related to publicly funded Paxlovid™ are considered under the LTC capitation funding model and must be provided by the LTC home's contracted primary pharmacy service provider. Pharmacies must submit claims for prescribing or dispensing services related to publicly funded Paxlovid™ with a zero-dollar fee. In emergency situations, secondary pharmacy service providers (i.e., those that do not have a contract with a LTC home) may be reimbursed an applicable fee for prescribing and/or dispensing services related to publicly funded Paxlovid™ to LTC home residents, in accordance with the EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies.

21. Can an eligible individual be an Ontario Drug Benefit (ODB) recipient and not have an Ontario health number?

Yes. There may be circumstances where an individual who is an eligible ODB recipient does not have an Ontario health number, such as an individual who is issued a temporary health number by the Ministry of Children, Community and Social Services that is used until the Ontario health number is issued, or an individual who is not eligible for an Ontario health number but has a paper Drug Benefit Eligibility Card. In these cases, the temporary eligibility number must be used for the HNS claim submission.

22. Can a pharmacist still submit a claim for payment for providing publicly funded prescribing and dispensing services related to Paxlovid™ if an eligible individual forgot to bring their Ontario health number?

No. If the patient has an Ontario health number, then the pharmacist needs the individual's Ontario health number in order to submit the claim for payment through the HNS.

23. Can the pharmacist who prescribes Paxlovid™ for an eligible individual submit a claim under the Pharmaceutical Opinion Program (POP) as part of the individual's medication therapy assessment? (e.g., when the pharmacist notifies an eligible individual's primary care provider about the treatment plan with Paxlovid™ and recommends adjustments to other drugs the patient is taking)

No. A professional intervention fee under the POP service cannot be claimed by the pharmacist who is prescribing publicly funded Paxlovid™.

Any adjustments to prescription drug therapy by the pharmacist prescribing Paxlovid™ that are adapted within the OCP Initiating, Adapting and Renewing Prescriptions [guidelines](#) are included in the Paxlovid™ prescribing services fee.

A pharmacist who provides a recommendation to changes in drug therapy under the POP would only apply to prescriptions that are authorized by another prescriber.

24. If the pharmacist recommends to a prescriber that an eligible individual should receive Paxlovid™ is the recommendation to the prescriber billable under the Pharmaceutical Opinion Program?

If the pharmacist has provided billable prescribing services related to Paxlovid™, then a POP cannot be billed.

If the pharmacist has provided dispensing services and identifies that an individual is taking drug therapy that may interact with Paxlovid™ and after consulting the prescriber and exercising professional judgment, does not dispense Paxlovid™ pursuant to the other prescriber's prescription for Paxlovid™, this may be billable under the POP, if other POP requirements are met.

Please refer to the EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies for the appropriate PINs to use when dispensing Paxlovid™ pursuant to prescriptions. These POP PINs may be used for any eligible individual who receives a prescription for Paxlovid™, including non-ODB recipients.

For more information on the POP, please refer to the [Professional Pharmacy Services Guidebook](#) located on the ministry's [website](#). Pharmacies are responsible for ensuring that any POP billed complies with the applicable guidelines and policies.

25. Can pharmacists provide a MedsCheck service as part of prescribing Paxlovid™ to an eligible individual?

Pharmacists may provide a medication management service (MedsCheck) to individuals that are eligible for the MedsCheck program. A fee for a MedsCheck Follow-Up cannot be claimed for prescribing services related to publicly funded Paxlovid™.

26. Can a pharmacy submit a claim if the patient is not eligible for a Paxlovid™ prescription because the COVID-19 test is negative or symptoms presented more than 5 days ago?

No. A negative COVID-19 test result or symptoms that presented more than 5 days ago is considered pre-screening to determine if an individual is eligible for publicly funded prescription services related to Paxlovid™. A fee cannot be claimed if general pre-screening questions result in an individual not meeting the individual eligibility criteria.

Documentation Requirements

27. What are pharmacists required to document when providing publicly funded prescribing and/or dispensing services related to Paxlovid™ for eligible individuals?

Please refer to the most recent EO Notice on the Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for information about pharmacy documentation requirements.

28. Is there a prescription form that pharmacists are required to use?

There is no specific prescription form required by the Ministry. For information about individual eligibility, service requirements, and pharmacy documentation requirements,

please refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#).

29. What will happen if I forget to document or misplace the documentation?

If there is no documentation, incorrect or incomplete documentation, then the fee for services related to prescribing and/or dispensing publicly funded Paxlovid™ that is billed and paid may be subject to recovery by the ministry.

30. Can a pharmacy submit a claim manually to the ministry, using a paper claim?

No. The ministry does not accept paper claims unless 3 intervention codes are required in order to process the claim. All claims must be submitted electronically using the HNS.

You may refer to the most recent EO Notice: Prescribing & Dispensing Publicly Funded Paxlovid™ in Ontario Pharmacies available on the [ministry website](#) for detailed billing information.