

# ***UPDATED* Questions and Answers Document: Ontario Naloxone Program for Pharmacies**

Effective **December 2, 2024**

Pharmacies participating in the Ontario Naloxone Program for Pharmacies (ONPP) **must** review and comply with the Executive Officer (EO) Notice and this Questions and Answers document “the Materials”).

For Health Network System (HNS) claim submission issues, pharmacy staff may contact the ministry’s Ontario Drug Benefit (ODB) program help desk and refer to the [Ontario Drug Programs Reference Manual](#).

For other inquiries relating to the ONPP, please send an email to the ministry mailbox at [PublicDrugPrgms.moh@ontario.ca](mailto:PublicDrugPrgms.moh@ontario.ca).

The Materials set out the terms and conditions for a participating pharmacy’s submission of claims for payment (claims) for providing publicly funded naloxone kits to eligible Ontarians. Each document is a ministry policy that pharmacy operators must comply with under section 3.2. of the HNS Subscription Agreement for Pharmacy Operators.

## **Pharmacy Eligibility**

### **1. Is there a sign-up process for pharmacies to complete for the ONPP through the ministry?**

No, there is no sign-up process for pharmacies under the ONPP. Pharmacies must have an HNS Subscription Agreement with the ministry.

Pharmacies interested in participating must ensure their staff review and comply with the Materials.

### **2. What training is required for Part A pharmacists and other authorized pharmacy staff<sup>1</sup> regarding the distribution of naloxone kits under the ONPP?**

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<sup>1</sup> References in this document to “other authorized pharmacy staff” refer to interns, Part A pharmacy technicians, and intern technicians who are complying with the terms, conditions and limitations set out in Ontario Regulation 256/24 under the *Pharmacy Act, 1991*, as well as students who are in the course of fulfilling the educational requirements to become a member of the Ontario College of Pharmacists and who are authorized to dispense or sell drugs pursuant to a delegation under section 28 of the *Regulated Health Professions Act, 1991* (RHPA), or in accordance with clause 29(1)(b) of the RHPA. Please refer to this legislation for more information.

As with any pharmacy service, it is the professional responsibility of Part A pharmacists and other authorized pharmacy staff to ensure they have undergone the appropriate training and have the required skills and resources to ensure the service is provided in a safe and effective manner. The Ontario Pharmacists Association (OPA) has available resources on their [OPA website](#) relating to naloxone.

Pharmacies should continue to refer to the requirements outlined in the [Ontario College of Pharmacists Guidance – Dispensing, Selling or Providing Naloxone](#) regarding the provision of naloxone.

## Recipient Eligibility

### 3. When can a pharmacy provide a publicly funded naloxone kit to an eligible individual?

Publicly funded naloxone kits may be provided by participating pharmacies to eligible individuals, in accordance with the EO Notice.

When an individual inquires about getting a naloxone kit, Part A pharmacists and other authorized pharmacy staff must ensure the individual meets the eligibility criteria under the ONPP and provide proper training before providing a kit.

Publicly funded naloxone kits can only be provided to an eligible individual within the physical premises of the pharmacy, subject to one exception. As an exception, publicly funded naloxone kits may be delivered to an eligible individual at an address in Ontario if:

- the eligible individual is unable to physically attend the pharmacy and requires the naloxone kit to be delivered to them at an address in Ontario; and
- the eligible individual is already receiving care from the pharmacy.

Training for eligible individuals receiving a kit on how to use it must be provided on an individual basis, in real-time, and not in group settings, every time an eligible individual is provided a kit. In the case of service provision for an eligible individual who is not at the pharmacy, the Part A pharmacist or other authorized pharmacy staff must offer real-time virtual training on the use of the naloxone kit. Training consisting solely of instructional videos or websites is not permitted.

All other requirements in the EO Notice must be met by the pharmacy (e.g., quantity limit and pharmacy documentation of service).

**Note:** The general rule under clause 7.1(c)(iv) of the HNS Subscription Agreement for Pharmacy Operators is that a pharmacy operator must not submit a claim to the Executive Officer that is in respect of a professional service that was not provided at the pharmacy. Despite this provision in the HNS Subscription Agreement, the ministry is allowing pharmacies participating in the ONPP to provide naloxone kits to

eligible individuals who are not within the physical premises of the pharmacy and real-time virtual training in the limited circumstances described in the exception above.

**4. Can naloxone kits be provided to eligible individuals who are from First Nations communities under the ONPP?**

Yes, naloxone kits can be provided to eligible individuals (together with training) who are and/or identify as being from First Nations communities provided they meet ONPP eligibility requirements, subject to any restrictions set out in the EO Notice.

**5. How can an eligible individual without an Ontario health card number obtain a naloxone kit from a pharmacy? Can a person who is seeking naloxone or training at a pharmacy still maintain their anonymity as a “non-identified person”?**

Reasonable efforts must be made to obtain an Ontario health card number when providing a naloxone kit. Pharmacists are expected to ask for an Ontario health card when providing naloxone kits to eligible individuals.

However, should the eligible individual **not** have an Ontario health card or choose not to present it, pharmacists can still provide a naloxone kit if the individual is determined to be eligible based on the eligibility criteria and the professional judgement of the pharmacist.

Eligible individuals can also obtain publicly funded naloxone kits without an Ontario health card from community-based organizations (e.g., needle syringe programs, Hepatitis C programs, public health units) under the Ontario Naloxone Program (ONP) provided the eligibility criteria are met. The free naloxone [locator tool](#) displays local ONP and ONPP access points.

**6. How many naloxone kits can be provided to an eligible recipient at one-time? Are there exceptions to the restrictions relating to the distribution of naloxone kits under ONPP?**

Please refer to the EO Notice for details on eligibility, claim limits, and billing procedure.

**7. Are first responders eligible to receive naloxone kits under the ONPP?**

No. Police, fire services and St. John Ambulance Branches are eligible under the Ontario Naloxone Program (ONP) to receive publicly funded naloxone through their

local public health unit for use when responding to opioid overdoses. First responders should contact their local public health unit to inquire about naloxone kits and access to supply.

**8. Are businesses, health care organizations, or people acting on behalf of businesses/organizations eligible to receive naloxone kits under the ONPP?**

No. A business and/or organization, and/or a person acting on behalf of a business and/or organization, does **not** qualify as an eligible individual under the ONPP.

Businesses (e.g., restaurants, retail stores, gyms, etc.) and health care organizations (e.g., hospitals, clinics, hospices, congregate settings, non-profit corporations, etc.) and/or people acting on behalf of these organizations must be directed to their own organizations to inquire about naloxone kits and access to supply.

The ONPP remains targeted to individuals at risk and their families and friends, and is **not** intended to provide naloxone kits to employers or for occupational safety purposes.

More information on the ONPP and ONP's take-home naloxone programs can be found at [Ontario Take-Home Naloxone Programs | ontario.ca](https://ontario.ca/take-home-naloxone).

The *Occupational Health and Safety Act* (OHSA) requires that naloxone be available in some workplaces in case a worker has an opioid overdose.

- Inquiries related to the OHSA requirements should be directed to the Ministry of Labour, Immigration, Training and Skills Development (MLITSD) at [WebHSpolicy@ontario.ca](mailto:WebHSpolicy@ontario.ca).

**9. Can naloxone kits be provided for veterinary purposes?**

Naloxone kits provided for veterinary purposes are **not** eligible for reimbursement under ONPP.

**Contents of the Naloxone Kits**

**10. Can each kit be assembled with more than 2 doses of naloxone, or a mix of injectable and intranasal naloxone?**

No. Pharmacies must follow the EO Notice on details on the kit contents and funding amount eligible for claims under the ONPP. The product standards are set out to be consistent across all publicly funded naloxone programs.

**11. Can the pharmacy decide what to include in the naloxone kit?**

No. Eligible claims under the ONPP must follow the details of the kit contents including product DINs described in the EO Notice.

## **Training**

### **12. When must training be provided to eligible individuals receiving a naloxone kit?**

The training for eligible individuals receiving a kit on how to use it must be provided on an individual basis, in real-time, and not in group settings, every time an eligible individual is provided a kit. Training consisting solely of instructional videos or websites are not permitted, but real-time virtual training may be provided. For clarity, even though pharmacies cannot submit claims for a training fee when replacement kits are provided to eligible individuals, training must be provided each time an eligible person is provided with a kit, regardless of whether the kit is an initial kit or a replacement kit.