

UPDATED Executive Officer Notice: Ontario Naloxone Program for Pharmacies

Effective May 5, 2025

This is an update to an earlier Executive Officer ("EO") Notice dated January 28, 2025.

This notice provides information on updates to the Ontario Naloxone Program for Pharmacies (the "ONPP").

This 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 Health Network System (HNS) Subscription Agreement for Pharmacy Operators.

Only Part A pharmacists and other authorized pharmacy staff¹ (acting under the supervision of a pharmacist who is physically present), 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 Part A pharmacists and other authorized pharmacy staff are trained to provide the necessary training to eligible persons who are to receive the naloxone kits.

Overview of Changes

Under the ONPP, a new injectable pre-filled syringe naloxone product (made by Sterinova) will be publicly funded. Effective **May 5, 2025**, updates to the ONPP are as follows:

- Adding PINs 93877263 and 93877264 for injectable naloxone in the pre-filled syringe format.
- Prohibiting a participating pharmacy from accepting or processing orders for naloxone kits under the ONPP using a website or any electronic communication service other than a telephone or videoconference line that allows an individual to speak in *real-time* with a Part A pharmacist or other authorized pharmacy staff.

¹ 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.



For clarity, the following electronic communication services are prohibited: Short Message Service (SMS), social media platform, app, email, digital fax, and voicemail.

- Clarifying documentation requirements for participating pharmacies that distribute naloxone kits to eligible individuals based on telephone or videoconference orders that allow an individual to speak in *real-time* with a Part A pharmacist or other authorized pharmacy staff.
- Clarifying a delivery timeline for naloxone kits delivered to an eligible individual at a valid address in Ontario. Pharmacies must ensure that the naloxone kit is picked up by a delivery agent for delivery to an eligible individual within ten (10) business days of accepting the eligible individual's order for a naloxone kit.

Effective June 16, 2025

- Updates to the kit contents and specification of drug products (Appendix A)
 - o All naloxone kits must include a zippered hard case with a "naloxone" cross.

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 National Association of Pharmacy Regulatory Authorities (NAPRA) National Drug Schedule (NDS) and does not require a prescription to be dispensed in pharmacies if indicated for emergency use for opioid overdose outside of a hospital setting, subject to jurisdiction-specific requirements.

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

- 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 have a valid HNS Subscription Agreement with the ministry.

Recipient Eligibility



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

- an individual who is at-risk of opioid overdose due to either currently using opioids or at-risk of returning to opioid use or
- a family member or friend, or other individual 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. There is no cost to eligible individuals who receive eligible services under the ONPP, unless otherwise specified in this Notice.

Eligible Services

Subject to the Exclusions and Restrictions below, a participating pharmacy must provide the following services ("eligible services") to an eligible individual, in order to submit a claim for payment to the ONPP:

The provision of a naloxone kit to the eligible individual within the physical
premises of the pharmacy, subject to the limited exception below, based on an
order from the eligible individual that is made in-person at the pharmacy or by
telephone or videoconference conversation with a Part A pharmacist or other
authorized pharmacy staff that is documented.

Exception: This requirement for the provision of the naloxone kit within the physical premises of the pharmacy does not apply if the eligible individual is already receiving care from the pharmacy and is unable to physically attend the pharmacy and requires the naloxone kit to be delivered to them at a valid address in Ontario. The participating pharmacy must ensure that the naloxone kit is picked up by a delivery agent for delivery to an eligible individual within ten (10) business days of accepting the eligible individual's order for a naloxone kit.

- Where unforeseen and exceptional circumstances prevent the participating pharmacy from meeting the delivery timeline described above, pharmacies must ensure that the unforeseen and exceptional circumstances are documented as soon as possible following the expiry of the timeline.
- The provision of training to every eligible individual, every time they receive a
 naloxone kit. The training must be provided, on an individual basis, in real-time,
 and not in group settings. Training consisting solely of instructional videos,
 written materials (e.g. pamphlets), or websites is not permitted, but real-time
 virtual training may be provided.

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Ministry of Health Health Programs and Delivery Division

Pharmacists are expected to use their professional judgement when providing naloxone kits to eligible individuals under the ONPP.

Naloxone Kits Contents

The ministry does **not** procure naloxone kits and/or supplies for participating pharmacies but does mandate required kit contents.

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

Pharmacy-assembled naloxone kits must be assembled by a Part A pharmacist, or other authorized pharmacy staff acting 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 (with the same DIN).

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. Reasonable efforts must be made to obtain the eligible individual's Ontario health card number.

If the eligible individual is a recipient of the Ontario Drug Benefit (ODB) program:

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

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

- Patient Gender: 'F' = female; 'M' = male
- Patient Date of Birth: Valid YYYYMMDD
- Patient's Ontario Health number
- Intervention codes:
 - 'PS': Professional Care Services
 - o '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



If the eligible individual is **not** an ODB program recipient and **does not have an**Ontario health card 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:

o 'PS': Professional Care Services

Product Identification Number (PIN): see Table 1 below for list of PINs

- A valid Pharmacist ID is required in the prescriber field for all claim submission, this
 is the licence 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 and training provided to each eligible individual by participating pharmacies, subject to the Exclusions and Restrictions below.
- A maximum of two (2) naloxone kits of any type (i.e., total 4 doses) may be
 provided upon request to an eligible individual per day and must be submitted as a
 single claim for payment.
 - Pharmacies can submit claims for double kits of the *same* naloxone kit format with a single professional fee for *only* the combinations listed as follows. Note <u>all</u> 4 doses for each PIN listed *must* be the same DIN, see Appendix A).
 - PIN 93877257 Two injectable kits of ampoule or vial (one initial and one replacement kit with one professional fee and one training fee only)
 - PIN 93877258 Two injectable kits of ampoule or vial (two replacement kits with one professional fee)
 - PIN 92877264 Two injectable kits of pre-filled syringe
 - PIN 93877262 Two intra-nasal kits

Table 1: Naloxone kits funded under the ONPP

PIN	Naloxone Kit Type and Description	Total Amount Paid
	One Injectable Kit – ampoule or vial	
93877251	 \$35 – cost of one kit 	\$70
	 \$10 – professional fee 	



PIN	Naloxone Kit Type and Description	Total Amount Paid
	• \$25 – training fee	
93877252	One Injectable Kit - ampoule or vial (replacement kit with no training) • \$35 – cost of one kit • \$10 – professional fee	\$45
93877263	One Injectable Kit - pre-filled syringe • \$40 – cost of one kit • \$10 – professional fee	\$50
93877257	Two Injectable Kits (one initial and one replacement kit with one professional fee and one training fee only) • \$70 – cost of two kits • \$10 – professional fee • \$25 – training fee	\$105
93877258	Two Injectable Kits - ampoule or vial (two replacement kits with one professional fee only) • \$70 – cost of two kits • \$10 – professional fee	\$80
93877264	Two Injectable Kits - pre-filled-syringe • \$80 – cost of two kits • \$10 – professional fee	\$90
93877261	One Intra-Nasal Kit • \$64 – cost of one kit • \$10 – professional fee	\$74
93877262	Two Intra-Nasal Kits • \$128 – cost of two kits • \$10 – professional fee	\$138

Notes

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

Pharmacy documentation requirements

Part A pharmacists, other authorized 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 Ontario College of Pharmacists or the ministry.

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Ministry of Health Health Programs and Delivery Division

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, unless otherwise noted below.

For every naloxone kit distributed to an eligible individual under the ONPP, participating pharmacies must keep a record of service provision, including:

- The number and type of naloxone kit(s) provided and details of the training provided;
- Name and address of pharmacy where services were provided, signature of authorized pharmacy staff who provided the naloxone kit; and
- Date of service

If an eligible individual is unable to physically attend the pharmacy and requires the naloxone kit to be delivered to them at an Ontario address, participating pharmacies must keep additional documentation, including:

- Whether the order was placed by telephone or videoconference;
- The reason the individual is unable to physically attend the pharmacy;
- Date of the order, date on which the naloxone kit was picked up by the delivery agent for delivery to the eligible individual, and the date on which the naloxone kit was received by the eligible individual; and
- Any exceptional and unforeseen circumstances that prevented the pharmacy from giving the naloxone kit to a delivery agent for delivery to the eligible individual within the timeline described above.

In addition, reasonable efforts must be made to obtain the eligible individual's identity and contact information, including:

- Name, date of birth, and address of eligible individual,
- Ontario health card number of eligible individual

Exclusions and Restrictions under the ONPP

Naloxone kits **cannot** be distributed to an eligible individual outside the physical premises of the pharmacy, unless the eligible individual is already receiving care from the pharmacy and is unable to physically attend the pharmacy, and requires the naloxone kit to be delivered to them at an address in Ontario. Where this occurs, the eligible individual **must** order the naloxone kit from the pharmacy by telephone or videoconference and **must** speak in *real-time* with a Part A pharmacist or other authorized pharmacy staff. Pharmacy staff must offer *real-time* virtual training on the



use of the naloxone kit. Training consisting solely of instructional videos, written materials (e.g., pamphlets), or websites is not permitted.

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 (PINs 93877251, 93877252, 93877263 and 93877261) submitted twice in a day for an eligible individual as two kits.
- Naloxone kits that are ordered by recipients through a website or any electronic
 communication service other than a telephone or videoconference line that
 allows the eligible individual to speak in *real-time* with a Part A pharmacist or
 other authorized pharmacy staff. For clarity, the following electronic
 communication services **cannot** be used to accept or process orders: Short
 Message Service (SMS), social media platform, app, email, digital fax, and
 voicemail.

In addition:

- Only the cost of the kit (without the professional fee) is eligible for payment for residents of long-term care homes.
- A claim under the Pharmaceutical Opinion Program **cannot** be submitted for the recommendation for, and/or provision of naloxone kits.
- Overpayments due to inappropriate claim submissions are subject to recovery.

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) zippered hard case with a "naloxone" cross
- Two (2) doses of naloxone hydrochloride intra-nasal spray 4 mg/0.1 mL (DIN 02511568, or DIN 02458187) (both doses must have the same DIN)
- 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) zippered hard case with a "naloxone" cross
- Two (2) alcohol swabs
- 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)
- Either one of the following:
 - Ampoule or Vial:
 - Two (2) 1 mL ampoules or vials of naloxone hydrochloride injection 0.4 mg/mL (DIN 02453258, 02455935, or 02458578) (both doses must have the same DIN)
 - Two (2) safety engineered syringes with 25g x 1" (one inch) needles attached, as applicable
 - Two (2) safe ampoule-opening devices (also known as breakers, snappers, or openers), as applicable

Pre-Filled Syringe:

■ Two (2) 1mL 22G ½ needles of naloxone hydrochloride injection 0.4mg/mL (DIN: 02548194) (both doses must have the same DIN)