



ONTARIO
PHARMACISTS
ASSOCIATION



PREFERRED PROVIDER NETWORKS

CONSULTATION TOOLKIT

JUNE 2025

The Ontario government is currently consulting on the role of pharmacy Preferred Provider Networks (PPNs) in the employer-sponsored drug insurance sector.

This is the Ministry of Finance's second public consultation, building on earlier engagement to explore specific regulatory options for pharmacy PPNs. The consultation aims to identify a balanced approach that supports patient choice, maintains affordability, promotes positive health outcomes, and encourages fair competition across the pharmacy sector.

The deadline to provide input on this consultation is July 28, 2025.

The consultation is considering **two potential policy options**:



Any Able and Willing Provider (AAWP) Framework:

Promote choice and competition by mandating that any pharmacy PPN be open to any pharmacy operator that is able and willing to meet a PPNs' terms.



Standardized and Mandatory Exemptions (SME):

Standardizing mandatory exemptions to pharmacy PPNs so that consumers can access pharmacies outside their network. While SME does not have a precedent in other jurisdictions, this proposed approach is informed by concerns that the government heard during the initial consultation regarding the lack of consistency in existing exemption processes.

This consultation represents a major step forward – and an opportunity to ensure Ontarians can access the medications they need, at the pharmacy they choose.

OPA'S POSITION

The Ontario Pharmacists Association (OPA) is calling on the government to adopt a patient-first approach as it considers guidelines for PPNs.

OPA supports the overall direction and concept of AAWP legislation in Ontario. While a full ban on PPNs is preferred, if the government moves forward with its decision, there must be clear provisions along with appropriate oversight and enforcement that:

1. **Protect patient choice:** Ensure that patients can continue to choose the pharmacy that best meets their needs without being restricted to a specific provider network.
2. **Protect patient access:** Recognize that patients – especially those in rural, remote, or underserved communities – require flexible options to avoid additional travel or cost burdens.
3. **Prohibit penalizing patients for using their preferred pharmacy:** Prevent plans from including terms that penalize a patient for choosing an out-of-network pharmacy.
4. **Eliminate restrictions on PPNs:** Allow any pharmacy that meets the terms of a PPN to join, supporting a level playing field, and ensure that criteria for participation do not impose unnecessarily restrictive definitions of “Able” that could exclude qualified providers from operating within their full professional scope.
5. **Guarantee fair terms:** Ensure participation terms for PPNs are fair, transparent, and achievable.
6. **Protect professional autonomy:** Ensure that pharmacy professionals maintain the autonomy and ability to provide patient care based on their professional obligations under the Standards of Practice and Code of Ethics.
7. **Prevent conflicts of interest:** Include safeguards to avoid business relationships affecting patient care and choice (e.g., when companies that manage drug plans also own the pharmacies they steer patients toward).
8. **Promote transparency:** Develop clear and consistent expectations for how PPNs operate and report on participation.

To ensure a comprehensive and robust approach, OPA supports the Ontario College of Pharmacists (OCP) in continuing to explore regulatory solutions focused on the roles of pharmacists and pharmacies to protect patient and professional autonomy. Establishing clear guidance and expectations is essential to strengthening the intent of the changes and to prevent the creation of unintended challenges.

Together, these changes will help to protect patient choice and promote better health outcomes in addition to ensuring that the practice of pharmacy remains patient-centered, safe, and ethically sound, while fostering fair competition for all pharmacies.

OUR PROGRESS SO FAR

Since 2016, OPA has been a leading voice on this issue, highlighting issues around closed PPNs on patient choice and access.

Nov
2016

OPA prepared an assessment of “Any Willing Provider” (AWP) legislation in Ontario to evaluate potential legislative approaches and stakeholder impacts.

Nov
2017

OPA submitted formal input on *Bill 160: Strengthening Quality and Accountability for Patients Act* and presented at the Standing Committee on General Government, warning against the risks of closed PPNs and calling for AWP legislation.

Feb
2018

OPA published a position paper on AWP legislation, outlining the case for protecting patient choice and ensuring all pharmacies have the opportunity to participate in benefit plans under fair conditions.

Jun
2023

OPA commissioned three expert reports to strengthen its position against closed PPNs. These included reports on patient safety, PPN economics, and the ethics of mandated PPN participation.

Summer
2024

In response to increasingly restrictive practices, OPA ramped up its advocacy efforts – meeting with policymakers and calling for AWP legislation.

Fall
2024

The government launched a consultation. We heard from over 400 patients and pharmacy professionals sharing stories about how PPNs were limiting access to care.

Spring
2025

As a result of continued advocacy, Budget 2025 included a commitment to a second consultation focused on regulatory solutions.

We’re closer than ever, but the work isn’t over yet.

KEY MESSAGES

OPA has developed this toolkit to assist pharmacy professionals, stakeholders, and key partners in efforts focused on advocating for AAWP legislation based on a patient-centric framework. This document includes key messages, sample social media posts as well as a draft letter that can be sent to government as part of the consultation process.

While OPA remains encouraged by the progress following the initial consultation and sustained discussions with the government, now is a critical time for members and supporters to make a final push. This means not only demonstrating support for the overall direction and concept of AAWP legislation, but also advocating for strong, clearly defined provisions that protect patient choice and access, ensure appropriate oversight and enforcement, and create a level playing field for pharmacies.

- Ontarians rely on their pharmacists and pharmacy teams to provide care when it is needed most, including to fill their prescriptions, provide counselling and education, and ensure appropriate monitoring and follow-up.
- Unfortunately, contractual arrangements between some insurers and pharmacy operators that result in exclusive drug distribution by designated pharmacy operators, known as closed PPNs, have put at risk the care that patients count on from their local pharmacy.
- Closed PPNs have a detrimental effect on both patients and pharmacies across the province by limiting patient choice, safety, convenience, and access.
- OPA supports the overall direction and concept of implementing Any Able and Willing Provider (AAWP) legislation in Ontario to guide how PPNs operate.
- However, for AAWP legislation to be effective, it must include clearly defined provisions that uphold patient choice, protect access to care, support a level playing field for all pharmacies, and ensure appropriate oversight and enforcement.
- The definition of “Able” must also not be unnecessarily restrictive and should reflect the professional and operational capabilities of qualified pharmacies across Ontario.
- In parallel, OPA supports the Ontario College of Pharmacists (OCP) in continuing to explore regulatory solutions focused on the roles of pharmacists and pharmacies to protect patient and professional autonomy.
- Establishing clear guidance and expectations is essential to strengthening the intent of the changes and to prevent the creation of unintended challenges.
- Together, these changes will help to protect patient choice and promote better health outcomes in addition to ensuring that the practice of pharmacy remains patient-centered, safe, and ethically sound, while fostering fair competition for all pharmacies.

Patient Choice

- Patients should have the freedom to choose their pharmacist/pharmacy.
- PPNs must not restrict this freedom by forcing patients to seek care from a limited network of providers.
- AAWP legislation based on a patient-centric framework will protect patient autonomy by allowing them to select their health care providers based on their preferences and specific needs.

Convenience and Access

- Limiting provider options through closed PPNs can result in longer wait times and reduced access to necessary services, especially in rural, remote or underserved communities.
- AAWP legislation based on a patient-centric framework will ensure that all patients, regardless of location, can access the care they need, when and where they need it.

Positive Health Outcomes

- Continuity of care is essential for managing chronic conditions and ensuring positive health outcomes.
- Closed PPNs disrupt ongoing patient-provider relationships, which can lead to lapses in treatment and potential safety risks.
- AAWP legislation based on a patient-centric framework will promote positive health outcomes through the provision of safe and continuous care by allowing patients to maintain their relationships with their pharmacists and pharmacy teams.

Professional Autonomy

- Patients trust and rely on pharmacy professionals who in turn have an obligation to put the interests of their patients and the public ahead of their own professional interests.
- Closed PPNs impact the ability of pharmacy professionals to practice in accordance with OCP's Standards of Practice and Code of Ethics.
- AAWP legislation based on a patient-centric framework will ensure that pharmacy professionals maintain the autonomy and ability to provide patient care based on their professional obligations.

Supporting Small Businesses

- Many pharmacies are small businesses, particularly in rural and remote areas.
- Current policies that favor closed PPNs put these businesses at risk by preventing them from being able to provide comprehensive care to their patients.
- AAWP legislation based on patient-centric framework will support small pharmacy owners and operators by defining fair and required parameters that allow them the opportunity to compete on a level playing field.



**Your health
care, your
choice**



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Your health care, your choice.
@OntPharmacists support
legislation that lets you
choose the pharmacy that's
right for you. 💊

Take Action:

<https://yourpharmacycares.ca/>



**Ontario Pharmacists
support convenient
care, closer to home.**



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@OntPharmacists support
making care more convenient
and closer to home for
everyone. 🏠 Together, we
can ensure health care is
accessible for Ontarians across
the province.

Take Action:

<https://yourpharmacycares.ca/>



Access to care should be simple. @OntPharmacists support your ability to choose your pharmacy to ensure you get the care you need, when you need it. 🏠

Take Action:

<https://yourpharmacycares.ca/>



Small pharmacies, BIG impact! 🏠 @OntPharmacists support keeping your trusted local pharmacies open and accessible when you need them most.

Take Action:

<https://yourpharmacycares.ca/>



Your health care, your choice



Right now, many patients are limited to specific pharmacies due to network restrictions with their insurance plans. @OntPharmacists is committed to working with the Government to change that, giving you the freedom to choose where you get your care. 💊

Take Action:

<https://yourpharmacycares.ca/>

DRAFT LETTER RESPONSE FOR CONSULTATION (PHARMACISTS & PHARMACY OPERATORS)

All letters should be sent via email to FIPUConsultations@ontario.ca by **July 28, 2025**.

Dear Minister Bethlenfalvy,

I am writing to you today in response to the Ministry of Finance's second consultation on Preferred Provider Networks (PPNs) in Ontario, as outlined in the consultation paper *Preferred Provider Networks in Group Insurance Plans*, from May 29, 2025. I appreciate the opportunity to share my perspective as a pharmacy professional, in support of a policy approach that supports both patient access and fair competition.

This consultation represents an important step forward in shaping a framework that promotes access and fairness within Ontario's pharmacy benefits landscape. As someone who works closely with patients every day, I believe a full ban on PPNs would be the most effective. However, among the options presented in the consultation, I believe that Any Able and Willing Provider (AAWP) legislation offers the most promising path toward achieving these goals. As you consider next steps, I encourage the government to also ensure that clear provisions along with appropriate oversight and enforcement are established to:

- **Protect patient choice:** Ensure that patients can continue to choose the pharmacy that best meets their needs without being restricted to a specific provider network.
- **Protect patient access:** Recognize that patients – especially those in rural, remote, or underserved communities – require flexible options to avoid additional travel or cost burdens.
- **Prohibit penalizing patients for using their preferred pharmacy:** Prevent plans from including terms that penalize a patient for choosing an out-of-network pharmacy.
- **Eliminate restrictions on PPNs:** Allow any pharmacy that meets the terms of a PPN to join, supporting a level playing field, and ensure that criteria for participation do not impose unnecessarily restrictive definitions of "Able" that could exclude qualified providers from operating within their full professional scope.
- **Guarantee fair terms:** Ensure participation terms for PPNs are fair, transparent, and achievable.
- **Protect professional autonomy:** Ensure that pharmacy professionals maintain the autonomy and ability to provide patient care based on their professional obligations under the Standards of Practice and Code of Ethics.
- **Prevent conflicts of interest:** Include safeguards to avoid business relationships affecting patient care and choice (e.g., when companies that manage drug plans also own the pharmacies they steer patients toward).
- **Promote transparency:** Develop clear and consistent expectations for how PPNs operate and report on participation.

To ensure a comprehensive and robust approach, I also support the Ontario College of Pharmacists (OCP) in continuing to explore regulatory solutions focused on the roles of pharmacists and pharmacies to protect patient and professional autonomy. Establishing clear guidance and expectations is essential to strengthening the intent of the changes and to prevent the creation of unintended challenges.

Together, these changes will help to protect patient choice and promote better health outcomes in addition to ensuring that the practice of pharmacy remains patient-centered, safe, and ethically sound, while fostering fair competition for all pharmacies.

As a pharmacy professional, I encourage the Government of Ontario to move forward with AAWP legislation based on a patient-centric framework that defines the required parameters for PPN arrangements, as outlined above. This approach would help protect patient choice and access, support enhanced patient health outcomes, and promote fairness across the pharmacy sector.

Thank you for your continued engagement on this important issue and for the opportunity to provide input.

Sincerely,

[Name]

[City, Province]

[Role]

SUPPORTING PATIENT ENGAGEMENT

For pharmacists and pharmacy operators whose patients are interested in advocating for policy changes to address PPNs, we have provided messaging and a pre-written letter template to support their involvement.

Suggested Messaging to Engage Patients:

Hello! I don't know if you have heard, but some of our patients are being told they can't come to this pharmacy because of their insurance plan.

As a local pharmacist, I am concerned that patients are not able to access their medications from a pharmacy of their choice.

You should be able to decide who provides your care and stay connected with pharmacists who know your health history best.

The government is currently exploring solutions to protect your right to choose where you receive your medications, and they want to hear from you.

I am advocating for Any Able and Willing Provider (AAWP) legislation that is based on a patient-centric framework to protect your right to choose your pharmacy—with no restrictions and no barriers.

Would you be willing to help us demonstrate to the government why this is an important issue?

[If yes...] Would you be willing to send a letter to the government expressing your support for AAWP legislation based on a patient-centric framework?



Protect Your Right to Choose Your Pharmacy



Currently, some Ontarians can't access their medications from the pharmacy of their choice. We don't think it should be this way.

That's why we're glad the government is exploring solutions to ensure everyone can receive the care they need, when and where they need it.

But to make a real impact, we need your voice. We want decision makers in government to hear directly from you—the patients and pharmacy professionals affected by these policies every day.

Get Involved

Help us advocate for Any Able and Willing Provider (AAWP) legislation based on a patient-centric framework to ensure your right to choose the pharmacy that best meets your needs.



Scan this QR code to visit our website to learn more about Any Able and Willing Provider (AAWP) legislation and submit a letter to the government supporting this change.

Have questions? Email us at info@opatoday.com

DRAFT LETTER RESPONSE FOR CONSULTATION (PATIENTS/CAREGIVERS/CONCERNED CITIZENS)

All letters should be sent via email to FIPUConsultations@ontario.ca by July 28, 2025.

Dear Minister Bethlenfalvy,

I am writing to you today in response to the Ministry of Finance's second consultation on Preferred Provider Networks (PPNs) in Ontario as outlined in the consultation paper dated May 29, 2025, titled *Preferred Provider Networks in Group Insurance Plans*. I appreciate the opportunity to share my thoughts on this important issue from a patient perspective.

As an Ontarian, I remain concerned about the impact of PPNs on my ability to choose my preferred pharmacy. These networks often limit options, directing me to pharmacies that may not be the most convenient, accessible, or aligned with my personal needs.

This second consultation is an opportunity to build on what was heard during the initial review and move toward an approach that protects patient choice while supporting access, fairness and continuity of care.

As such, I encourage the government to move forward with Any Able and Willing Provider (AAWP) legislation that includes clear provisions along with appropriate oversight and enforcement to:

- **Support my ability to choose:** I value being able to choose the pharmacy that best meets my needs, whether that's based on convenience, trust, or continuity of care.
- **Protect my access to care:** For patients like me, having flexible pharmacy options helps avoid unnecessary travel, costs, or delays.
- **Avoid added costs for using my preferred pharmacy:** I hope to continue accessing care from the pharmacy I trust, without facing higher co-pays or out-of-pocket expenses.
- **Support continuity of care:** Maintaining a consistent relationship with my pharmacist helps me manage my health more safely and effectively, especially when dealing with chronic conditions.
- **Enable my pharmacy team to prioritize my care:** Allowing my pharmacy team to practice based on their professional obligations will ensure that I can continue to receive safe and quality care.

In parallel, I support the Ontario College of Pharmacists in continuing to explore regulatory solutions focused on the roles of pharmacists and pharmacies to protect patient and professional autonomy. Establishing clear guidance and expectations is essential to strengthening the intent of the changes and to prevent the creation of unintended challenges.

Together, these changes will help to protect patient choice and promote better health outcomes in addition to ensuring that the practice of pharmacy remains patient-centered, safe, and ethically sound, while fostering fair competition for all pharmacies.

I have discussed my concerns about PPNs with my pharmacy and believe the Government of Ontario should introduce AAWP legislation based on a patient-centric framework, ensuring that I, and all Ontarians, retain the right to choose the pharmacy that best meets our individual needs.

Thank you for your leadership on this issue and for considering the patient voice in shaping what comes next.

Sincerely,

[Name]

[City, Province]



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