

Drugs and Devices Division
Ministry of Health and Long-Term Care
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January 28, 2019

Re: Proposed Amendments to Ontario Regulation 201/96 made under the Ontario Drug Benefit Act

To Whom It May Concern:

We cannot allow a child's healthcare to suffer by making access to medication dependent on their parents' ability to navigate a complicated system.

A simple system is safer for Ontario's children and youth. The proposed amendments to OHIP+ (Ontario Regulation 201/96 under the Ontario Drug Benefit Act) would put our young patients at risk of inadequate access to drugs that are important to prevent both long-term morbidities, and even mortality. If the proposed changes are implemented, it is unclear how access to medications will be uninterrupted. Especially for medications now covered by EAP, if a private insurer will not cover the drug, then a Trillium application will need to be submitted and approved prior to ongoing funding.

The Ontario Rheumatology Association (ORA), an organization representing Ontario Rheumatologists, both pediatric and adult, advises that the proposed significant changes will lead to risk of harm for many children and young adults, just when physicians and patients were finally adapting to the intricacies of OHIP+. The ORA has worked closely with the ministry in rolling out the original OHIP+ program. No organization is better placed to offer you advice.

We urge the current government to "Keep It Simple" to benefit all children and youth under 25 years old. We propose the following amended structure to OHIP+, with justifications below:

- 1) Patients without private insurance: OHIP+ will cover drugs on ODB formulary, with EAP program continuing as is; no co-pays (i.e. status quo for this group)
- 2) Patients with private insurance:
 - a) Private insurer as first payer
 - b) OHIP+ as second payer for those with insufficient/incomplete coverage

This structure would take the Trillium Drug Program “out of the equation” for families with significant out-of-pocket costs who would have to apply for additional support and pay significant copays in order to continue their current medications.

The ORA would like to formally request a meeting with Minister Christine Elliott and her representatives to discuss our concerns. We welcome the opportunity to describe the considerable challenges faced by many patients already trying to navigate the current public and private drug payment plans, where cumbersome processes already lead to hundreds of hours of confusing or pointless bureaucracy. Please confirm your availability to meet in person or via teleconference by February 15, 2019.

Please do not hesitate to contact us at admin@ontariorheum.ca with any questions or comments.

Sincerely,



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