



On behalf of the Canadian Society of Healthcare-Systems Pharmacy (CSHP) – Ontario Branch, we appreciate the opportunity to provide feedback on the College’s pre-consultation regarding Board size, composition, and term limits.

The mandate of the Ontario College of Pharmacists is to regulate pharmacy practice in the public interest and protect patients through effective governance, oversight, and regulation of the profession. Pharmacists and pharmacy technicians practising in hospitals, family health teams, and other institutional settings represent approximately 40% of the workforce regulated by the College. Given this significant proportion and the diversity of practice environments across the profession, effective governance benefits from a breadth of practice insight to ensure regulatory decisions remain balanced, practical, and aligned with the College’s public protection mandate.

Addition of elected Board directors

We support the addition of elected Board directors as a necessary response to the risks identified by the College, including the risk of becoming unconstituted and the growing capacity pressures on standing and statutory committees, particularly the Discipline Committee. Recent experiences underscore the fragility of operating at the statutory minimum and the importance of building governance resilience.

Beyond risk mitigation, adding elected directors also provides an opportunity to improve representation across diverse practice environments. There are substantive differences between community pharmacy practice and healthcare-system practice, including governance and funding structures, interprofessional accountability, employment models, and patient care pathways. These differences create unique regulatory considerations that benefit from informed Board-level insight.

Number and type of additional elected directors

We support the proposal to add two elected directors: one pharmacist and one pharmacy technician. This approach is proportionate and maintains balance between professions while improving Board capacity.

While directors are elected at large and not as formal representatives of specific practice settings, the College should actively ensure that the Board reflects the diversity of regulated practice environments across the profession. Pharmacists and pharmacy technicians practise in a wide range of settings, each with distinct governance structures, patient care models, and regulatory considerations.

Ensuring that elected directors collectively bring experience from a variety of practice settings will strengthen the Board’s ability to assess regulatory issues in context and support informed, balanced decision-making in the public interest. This diversity is particularly important given that many medication-related harms occur during transitions of care between practice settings, making

representation from multiple practice environments valuable to the College's public protection mandate.

Extension of term limits and the importance of staggered, diverse representation

We support extending cumulative term limits from six to nine consecutive years, recognizing that regulatory governance requires significant time to develop the expertise, judgment, and institutional knowledge necessary for effective oversight. Longer terms better support continuity, mentorship, succession planning, and the development of experienced leaders, particularly for complex statutory functions such as Discipline, Quality Assurance, and Executive Committee roles.

However, the effectiveness of longer terms depends on maintaining appropriate renewal and diversity of perspective. Term extensions should therefore be accompanied by intentional attention to staggered turnover and diversity of experience across the Board.

Some governance models address this balance by permitting up to nine years of service while incorporating a formal review or approval process beyond six years. Such approaches help ensure that extended tenure reflects both board need and continued effective contribution, while maintaining opportunities for renewal and the introduction of new perspectives.

Given the substantial differences in practice environments across our profession, it is important that the Board collectively reflects the breadth of regulated practice. Ensuring diversity of practice backgrounds among elected directors, supported through staggered terms and thoughtful succession planning helps maintain continuity of expertise while also strengthening the Board's ability to consider regulatory issues from multiple practice perspectives.

Broader governance considerations

Healthcare-system pharmacists and pharmacy technicians are governed under legislative and operational frameworks that differ meaningfully from community practice, including practice environments governed by the *Public Hospitals Act*. These differences can create governance and policy challenges when regulatory approaches are applied uniformly without sufficient appreciation of institutional practice realities. Strengthening Board capacity, continuity, and diversity of experience helps mitigate these challenges and supports more effective, context-sensitive regulation.

Additionally, many regulatory determinations are made through statutory committees such as Discipline, Quality Assurance, and Inquiries, Complaints and Reports. Ensuring diversity of practice experience across both Board and committee membership helps support informed decision-making and strengthens the College's ability to effectively protect the public across the full spectrum of pharmacy practice.

Conclusion

CSHP-OB supports the proposed by-law changes as a measured and governance-focused response to identified risks. Modestly increasing Board size and extending term limits, with an

emphasis on promoting diversity of practice backgrounds and maintaining staggered turnover, will strengthen continuity, succession planning, committee capacity, and the Board's ability to govern a diverse profession in the public interest.

Thank you for the opportunity to provide input as part of this important consultation.

Sincerely,

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President

Canadian Society of Healthcare- Systems Pharmacy – Ontario Branch