



**March 6, 2026**

**Public Consultation on Mandatory CPR and First Aid Training for Pharmacy Technicians Administering Injections**

On behalf of the Canadian Society of Healthcare-Systems Pharmacy (CSHP) – Ontario Branch, we appreciate the opportunity to provide feedback on the College’s consultation regarding mandatory CPR and First Aid training for pharmacy technicians administering injections.

CSHP-OB supports the College’s goal of ensuring that regulated pharmacy professionals administering injections have appropriate training to respond to medical emergencies and adverse reactions. As the scope of practice for pharmacy technicians continues to evolve, it is reasonable that safety expectations remain aligned with those already in place for pharmacists.

We offer the following considerations regarding implementation, benefits, and potential barriers.

**1. Effective Implementation**

For this requirement to be implemented successfully, the College should consider several operational factors that may affect registrants’ ability to obtain certification.

a) **Training Capacity and Accessibility**

The College may wish to engage with organizations such as St. John Ambulance, the Canadian Red Cross, and other recognized training providers to ensure adequate course capacity and accessibility across Ontario. In some regions, registrants already report limited availability of courses that combine Standard First Aid with CPR/AED Level C, which may require travel outside their local community.

Ensuring sufficient course availability will help prevent delays in certification and support timely compliance with the new requirement.

b) **Phased Implementation**

A phased implementation period would allow currently authorized pharmacy technicians adequate time to obtain certification without affecting their ability to administer injections. A reasonable transition period (for example, 12–24 months) may be appropriate, especially if course capacity is limited.

c) **Alignment with Injection Training**

The College may also wish to explore opportunities to integrate CPR and First Aid certification within injection training programs, where feasible. Combining these requirements could streamline the certification process and reduce the time required for registrants to obtain all necessary qualifications.

**2. Benefits of the Proposed Requirement**

Requiring CPR and First Aid certification provides an additional safety safeguard for patients receiving injections in pharmacy settings.

In community pharmacy environments, this requirement may provide particular benefit by enabling pharmacy technicians to respond immediately to medical emergencies or adverse reactions while additional support is sought.

In hospital and other institutional healthcare settings, emergency response systems and trained clinical response teams are typically already in place. In these environments, pharmacy technicians administering injections are usually working alongside pharmacists, nurses, or other healthcare professionals and have immediate access to established emergency response protocols. While the direct benefit may therefore vary across practice environments, the requirement may help standardize expectations across the profession and reinforce preparedness for managing rare but potentially serious adverse events and provide registrants the ability to move seamlessly across practice settings.

### **3. Potential Barriers to Compliance**

The College may wish to consider several factors that could affect compliance with the proposed requirement.

a) **Cost of Training**

Certification and recertification costs may represent a barrier for some pharmacy technicians, particularly if employers do not reimburse training expenses. In some cases, this could discourage technicians from obtaining or maintaining authorization to administer injections.

b) **Access to Training**

Availability of courses and travel requirements may also present barriers, particularly in smaller communities where courses may be offered infrequently.

c) **Workforce Impact**

If certification costs or accessibility challenges limit the number of technicians able to obtain or maintain authorization to administer injections, this could have downstream impacts on workflow in pharmacy settings. In these situations, other healthcare professionals may need to assume additional responsibilities for injection administration.

### **Conclusion**

CSHP-OB supports the College's objective of ensuring appropriate emergency preparedness for regulated professionals administering injections. Ensuring adequate training capacity, providing a reasonable implementation period, and recognizing the diversity of pharmacy practice environments will help support successful implementation of this requirement across the profession.

Thank you for the opportunity to provide input on this consultation.

Sincerely,



**Anthony Amadio**

**President | Ontario Branch**

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