



May 31<sup>st</sup>, 2026

Thank you for the opportunity to provide feedback on the proposed learning requirements for new minor ailments.

The Leslie Dan Faculty of Pharmacy (LDFP) at the University of Toronto respectfully submits that PharmD graduates are already prepared to independently assess and prescribe for acute pharyngitis, otitis externa, and herpes zoster. Accordingly, we recommend that new graduates be exempt from additional mandatory learning requirements or self-declaration processes related to these conditions.

The PharmD curriculum provides comprehensive, evidence-informed instruction on minor ailments. The latest minor ailments suite went to open consultation in November 2025 which provided time for LDFP to enhance training into our curriculum for those graduating 2026 and onwards. Students receive structured education on pathophysiology, clinical presentation, differential diagnosis, criteria for referral, and evidence-based treatment and follow-up. This content is delivered through integrated therapeutics courses, case-based learning, and hands on clinical skills training. Physical assessment training is a core component of the PharmD curriculum. Students receive hands-on instruction in otoscope use and participate in learning activities related to assessing the ears, nose, and throat, among other systems. Knowledge and skills are built through supervised practice and evaluated through written assessments, and objective structured clinical examinations (OSCEs). These assessment modalities ensure that graduates demonstrate competence in clinical decision-making, patient assessment, and implementation of care plans for minor ailments prior to entering practice. Graduates also complete training in injection administration, including subcutaneous injection techniques relevant to therapies including the administration of injectable extended-release buprenorphine (Sublocade®).

LDFP would be pleased to provide OCP with a summary of minor ailment training within the delivery of our courses so that OCP can hold a record of how LDFP students are trained in assessment and prescribing for acute pharyngitis, otitis externa, and herpes zoster or other conditions. While post licensure courses may support knowledge acquisition and confidence building for some practicing pharmacists, new graduates meet the competencies required to safely and effectively provide care for these conditions. For this reason, we do not believe additional mandatory training is warranted for new registrants. We also note concerns regarding the appropriateness of mandating training delivered by manufacturers or pharmaceutical companies, given the importance of maintaining independence in professional education.

We appreciate the College's commitment to ensuring high-quality patient care and would welcome further dialogue on how existing educational standards can continue to support effective and safe expansion of pharmacy practice.

Sincerely,

Natalie Crown, PharmD  
Director of the Doctor of Pharmacy Program on behalf of the Academic Leadership Team