



ONTARIO
PHARMACISTS
ASSOCIATION

**Ontario College of Pharmacists:
Public Consultation on Mandatory CPR and First
Aid Training for Pharmacy Technicians
Administering Injections**

**OPA Submission
March 5, 2026**

The Ontario Pharmacists Association ('OPA', the 'Association') is pleased to provide its comments and recommendations to the Ontario College of Pharmacists ('OCP', the 'College') on the proposed mandatory requirement for all pharmacy technicians (including intern technicians) who administer injections to complete and maintain valid CPR and First Aid certification. Currently, this training is mandatory for pharmacists (including interns and emergency assignment pharmacists) administering injections but only recommended for technicians who are injection trained.

OPA is committed to evolving the pharmacy profession and advocating for excellence in practice and patient care. With over 8,500 members, OPA is Canada's largest pharmacy-based advocacy organization and continuing professional development provider for pharmacy professionals. By leveraging the unique expertise of pharmacy professionals, enabling them to practice to their fullest potential, and making them more accessible to patients, OPA is working to improve the efficiency and effectiveness of the health care system.

Overall, OPA is supportive of initiatives that aim to enhance patient care and safety. As per the consultation posting, the proposed requirement is meant to support the safe implementation of anticipated [expanded scope of practice](#) activities, which, if approved, include enabling pharmacy technicians (including intern technicians) to administer all vaccines listed in Schedule 3 of Ontario Regulation 256/24 under the *Pharmacy Act, 1991*. It is also proposed that this requirement will better protect the public if adverse reactions occur following a vaccination and will standardize expectations among regulated pharmacy professionals who are administering injections.

As indicated in OPA's [submission](#) to the College's consultation on expanded scope of practice in November 2025, OPA is supportive of **expanding the scope of Part A pharmacy technicians and intern technicians to enable them to administer all vaccines** that are currently within the scope of Part A pharmacists and interns. In Ontario, pharmacy technicians are currently authorized to administer influenza, COVID-19 and RSV vaccines. As the technical knowledge and skills required to administer other vaccines listed in Schedule 3 of O. Reg. 256/24 are comparable to those already within a pharmacy technician's scope, including authorization to administer all these vaccines is a logical and safe extension of their current role.

With over 6,200 registered pharmacy technicians and intern technicians in Ontario who are trained to provide patient care, there is significant opportunity to enhance health system capacity by enabling them to administer vaccines. Community pharmacy immunization programs have been highly successful, as demonstrated by the annual influenza and COVID-19 vaccine programs. As pharmacists continue to take on an expanding role in delivering clinical services such as minor ailment assessments, optimizing the use of the full pharmacy team will help ensure patients continue to have timely and convenient access to immunizations. Enabling pharmacy technicians and intern technicians to perform the technical task of vaccine administration under the supervision of a regulated healthcare professional who has the authority to clinically assess vaccine appropriateness would support efficient team-based care. This approach would allow pharmacists to practice to their full clinical scope while enhancing overall immunization capacity across community pharmacies, local public health units and primary care settings.

Based on a jurisdictional scan of Canadian provinces (Table 1), 5 of the 7 provinces where pharmacy technicians have authority to administer vaccines require mandatory CPR and/or First Aid training.^{i,ii,iii,iv,v,vi,vii,viii,ix,x,xi,xii,xiii,xiv,xv,xvi,xvii} Given that most other provinces have adopted this requirement, OPA supports mandating the training in principle as it would reflect established regulatory best practice and promote national consistency. However, there are key considerations that the College should carefully evaluate and address prior to implementing this mandatory requirement.

Table 1: Jurisdictional Scan of Pharmacy Technician Authority to Administer Vaccines and CPR and First Aid Training Requirements Across Canadian Provinces

	BC	AB	SK	MB	ON	QC*	NB	NS	PEI	NL
Authority to Administer Vaccines	✗	✗	✓	✗	✓	✓	✓	✓	✓	✓
Requirement for CPR and First Aid Training	N/A	N/A	✗	N/A	✗	✓	✓	✓	✓	✓

*By delegation only; must have training in cardiopulmonary resuscitation and maneuvers in the event of airway obstruction on an adult, a child and a baby, including the use of an automated external defibrillator and the use of a mask and bag ventilation system

KEY CONSIDERATIONS

Type of Certification

OPA recognizes that standardizing expectations among regulated pharmacy professionals who are administering injections may have benefits including reinforcing consistent safety standards across the pharmacy team. Given that the technical role of vaccine administration performed by pharmacy technicians is equivalent to that performed by pharmacists, standardizing the requirement to have CPR and First Aid training may support public confidence by demonstrating that comparable regulatory expectations apply. This alignment can help reinforce that pharmacy technicians are equally capable, accountable and responsible members of the health care team when delivering immunization services.

However, **the College may wish to consider whether the same level of CPR and First Aid certification is necessary for both pharmacists and pharmacy technicians.** Currently, pharmacists who administer injections are required to have valid certification in CPR and First Aid equivalent to St. John Ambulance or Red Cross Standard First Aid & CPR/AED Level C. Since pharmacy technicians can only administer vaccines under supervision of a pharmacist or another health care professional who is required to have this certification, they may not need this same level of training. For example, while pharmacy technicians in New Brunswick and Nova Scotia are required to have valid certification in CPR and First Aid, the type of First Aid training required can be Emergency, Workplace or Standard First Aid in New Brunswick, and at a minimum Emergency or

Basic First Aid in Nova Scotia.^{xiv,xv} According to the Canadian Red Cross' first aid course descriptions, Emergency First Aid & CPR and Standard First Aid & CPR courses provide the same training in airway emergencies, breathing and circulation emergencies, first aid for respiratory and cardiac arrest, wound care, and opioid poisoning awareness information.^{xviii,xix} The additional training provided in the more comprehensive Standard First Aid & CPR course includes head and spine injuries; bone, muscle and joint injuries; sudden medical emergencies and environmental emergencies. As the rationale for the proposed mandatory training is to support potential expanded scope activities to enable pharmacy technicians and intern technicians to administer a broader range of vaccines, the additional topics covered under the Standard First Aid course may not be required. Requiring a less comprehensive level of certification for First Aid training would continue to support the original intent of the proposed change to increase patient safety by ensuring that pharmacy technicians and intern technicians have core emergency response skills, enabling them to immediately respond to emergencies and assist in the provision of CPR and First Aid with the availability of at least two trained responders (i.e., the supervising pharmacist and administering pharmacy technician). At the same time, this approach would help mitigate potential implementation barriers, such as additional time and costs associated with complying with the requirements, if mandated.

Timelines and Transition Period

OCP has indicated in its consultation posting that the timing of implementation of the proposed new requirement, if approved, would align with implementation of expanded scope activities which are to be determined by the government. OPA stresses that **timelines for implementation of any potential new mandatory requirements need careful planning and must include a reasonable transition period to support compliance and ensure continuity of care.** While some pharmacy technicians who administer injections may already have CPR and First Aid training, many do not. If the requirement were to come into force without an adequate transition period, there is a risk that pharmacy technicians who are presently authorized and competent to administer vaccines could temporarily be unable to do so until they complete the required additional training. This could inadvertently reduce immunization capacity at community pharmacies. To mitigate this risk, sufficient time must be provided to enable all impacted individuals the ability to complete the training prior to the proposed mandatory requirement coming into effect. Implementation timelines should also take into account seasonal vaccination campaigns, such as the influenza and COVID-19 vaccine programs, to avoid unintended disruptions during peak demand periods. Additional factors that may impact implementation timelines include the need for individuals to schedule time off work to attend a course, potential challenges in accessing training (especially in rural and remote communities where courses may be offered less frequently), and financial considerations that may affect when an individual can complete the training.

Effective Communication

Additionally, should the College proceed with the mandatory requirement, it would be prudent to **ensure all pharmacy technicians and intern technicians are informed of the changes and the approved training options.** This will support effective implementation by ensuring that affected individuals can easily navigate the new requirements with clarity and achieve compliance in a timely manner.

Awareness and Education

Furthermore, in addition to communicating changes to impacted pharmacy technicians and intern technicians, OPA recommends that if CPR and First Aid training is mandated, the College consider **broader awareness and education initiatives that clearly articulate the role, scope of practice and training of pharmacy technicians**. Public awareness efforts can help patients understand that pharmacy technicians who administer injections are regulated healthcare professionals who meet established standards and practice under appropriate supervision. Clear communication about their qualifications and role in vaccine delivery can enhance public confidence and support acceptance of technician-provided immunization services. Targeted education within the profession is also important to ensure consistent understanding of the role of pharmacy technicians. Reinforcing how pharmacy technicians contribute to safe and efficient immunization delivery can support optimal team-based care and promote effective integration into pharmacy workflows.

Strengthening awareness and confidence in pharmacy technicians both publicly and within the profession is essential to supporting uptake of technician-administered vaccines and positioning the profession for potential future scope enhancements, including authorization to administer a broader range of vaccines and other injectable substances, as appropriate.

Costs and Sustainable Remuneration

As noted in the College's consultation posting, the time and cost commitments associated with CPR and First Aid training would be the responsibility of registrants. The impact of these requirements on implementation timelines and compliance should therefore be carefully considered. While the College has indicated that CPR and First Aid training courses cost on average less than \$200, courses typically take one to two days to complete and must be renewed at a minimum once every 3 years. This may require time off from work, potentially resulting in additional indirect costs where compensation is not provided. For some individuals, the combined time and financial commitments may present barriers to timely compliance. Consideration should therefore be given to implementation approaches that minimize unintended access or capacity impacts, including reasonable transition periods and exploration of mechanisms that could support registrants facing financial hardship.

In addition, while the College has noted that the cost of the training could be the responsibility of employers, this may not be feasible given current financial pressures impacting the pharmacy sector, including stagnant dispensing fees and the absence of public funding for many pharmacy services. Since the feasibility of implementing the proposed requirement is also influenced by the broader funding environment in which pharmacies operate, alignment with appropriate remuneration structures will be important. Although decisions regarding service funding fall outside the College's mandate, collaboration and coordination between regulatory and policy changes with OPA's advocacy for appropriate funding for the sector will help ensure that safety initiatives and scope enhancements can be implemented effectively.

CONCLUSION

OPA appreciates the opportunity to respond to this consultation on proposed changes that, if approved, would mandate a new requirement that all pharmacy technicians and intern technicians who administer injections be certified in CPR and First Aid (equivalent to St. John Ambulance or Red Cross Standard First Aid & CPR/AED Level C).

Although mandating this requirement may offer benefits, particularly in the context of anticipated potential scope expansions including better protecting the public if adverse reactions occur following a vaccination and standardizing expectations among regulated pharmacy professionals who are administering injections, there are several key factors that must be thoroughly evaluated and addressed. Reassessing the level of certification required, establishing a reasonable implementation timeline with an appropriate transition period, developing an effective communication strategy, strengthening awareness and education regarding the changes, and addressing issues related to cost and sustainable remuneration will be essential to ensuring effective implementation and compliance with the proposed changes.

OPA remains committed to supporting the evolution of pharmacy practice. Should the College require, OPA would welcome further engagement to support effective and practical implementation of these proposed changes.

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