

# Summary of Consultation Findings

## Background

OCP's Board of Directors currently sets the number of elected directors and their maximum term limits through its by-laws, operating within the range established by the *Pharmacy Act* and the *Regulated Health Professions Act (RHPA)*.

In March 2020, the Board approved by-law changes to reduce Board size (including elected directors to the legislated minimum) and shorten director term limits from nine years to six. These changes, initiated in 2017 in collaboration with other health regulators, were intended to modernize governance and strengthen public trust in regulatory institutions.

In June 2025, the Governance Committee raised concerns about the impacts of the reduced Board size and term limits, including risks to succession planning and leadership development, committee capacity (particularly for Discipline hearing panels), and the Board's ability to remain constituted. The Board supported these concerns and directed staff to prepare a short report examining the implications of Board size and term limits, including policy and legal analysis, an environmental scan and draft by-law changes.

To support approval of any required by-law changes ahead of the 2026 election, the Board approved an open consultation at its December 8, 2025, meeting on two proposed by-law amendments:

- Increasing the number of elected board directors by two, consisting of one additional pharmacist and one additional pharmacy technician (from 9 to 11 elected directors); and
- Extending the maximum term limit for elected board directors from six to nine years, based on the ability to complete three consecutive three-year terms.

These proposals responded to three identified governance challenges: succession planning and leadership development, committee capacity (particularly for Discipline hearing panels), and maintaining board constitution. The Governance Committee oversaw a research and consultation process that included an environmental scan of 11 peer regulators, review of leadership attainment and tenure data, a review of Hearings Office data, a written submission from the Discipline Committee Chair, and a public consultation.

## Public Consultation Process

A 60-day open consultation on the proposed by-law changes was posted on the College website on January 6, 2026, and closed on March 6, 2026. Notice of the consultation was included in routine College communications throughout the consultation period.

The College received a total of 23 responses. Twenty-two individual responses were received through the consultation webpage, and one system partner response was submitted directly from the Canadian

Society of Healthcare-Systems Pharmacy Ontario Branch (CSHP-OB). Of the individual respondents, 21 were pharmacists and 1 was a pharmacy technician.

### Summary of Comments from System Partners

The only system partner response was received from the Canadian Society of Healthcare-Systems Pharmacy Ontario Branch (CSHP-OB). Overall, CSHP-OB expressed support for both proposed changes, with the following implementation considerations:

- Adding two elected directors (one pharmacist and one pharmacy technician) to address the risks of becoming unconstituted, capacity pressure on committees, and to improve representation across diverse practice environments, particularly healthcare-system pharmacy.
- Extending term limits to nine years to help develop expertise and support continuity, mentorship, succession planning, and leadership development for complex statutory functions, provided extensions are accompanied by staggered turnover and diversity of experience across the Board.

### Summary of Consultation Comments Received

The table below summarizes the feedback received, with a total of 22 individual responses (21 pharmacists and 1 pharmacy technician), and one system partner response. Notably, three comments were not published due to violation of posting guidelines but have been included in the results. One respondent submitted twice and is counted as one.

Q1: Add Directors? (Capacity/Risk)					Q2: How Many & Type?					Q3: Term Limits (9 Years)?			
Support	Oppose	Neutral/Support	Neutral/Oppose	Did Not Respond	Support	Oppose	Neutral/Support	Neutral/Oppose	Did Not Respond	Support	Oppose	Neutral/Support	Did Not Respond
8 (35%)	9 (39%)	2 (9%)	1 (4%)	3 (13%)	8 (35%)	9 (39%)	2 (9%)	1 (4%)	3 (13%)	6 (26%)	14 (61%)	1 (4%)	2 (9%)

#### Add Directors

Support for adding directors was evenly split, with 10 respondents in favour and 10 opposed. Three respondents did not indicate a preference.

Those in support emphasized that adding directors would:

- Ease resource constraints on discipline panels and other committees;
- Provide a quorum buffer to reduce the risk of becoming unconstituted;
- Better represent the diversity of pharmacy practice settings, including hospital and healthcare-system pharmacy; and
- Reflect the proportional makeup of registrants, including pharmacy technicians.

Those opposed raised concerns including:

- The board is already larger than most other health regulators and adding members risks decreased strategic focus and efficiency;

- Effectiveness depends on engagement and capability rather than headcount, and foundational structural and governance issues should be addressed first;
- Alternative risk controls for quorum exist (e.g., lower quorum by-laws for mid-term vacancies); and
- Adding professional directors without a corresponding increase in public members risks shifting the balance that underpins credible self-regulation.

### **Number and Composition of Added Directors**

Of the respondents who supported adding directors, only 3 were in favour of the proposed composition (one pharmacist and one pharmacy technician). Ten respondents suggested different compositions, including:

- Adding 2 to 3 directors with a focus on hospital/healthcare-system representation;
- Increasing public directors rather than professional directors;
- Maintaining the current ratio or matching the registrant percentage for pharmacy technicians; and
- Reinstating dedicated hospital sector positions, noting that general elections tend to favour community pharmacy due to registrant volume.

### **Increase Term Limits**

Support for extending term limits to nine years was opposed by most respondents, with 7 in favour, 14 opposed, and 2 not indicating a preference.

Those in support argued that:

- The Discipline Committee has a steep learning curve, and six years is insufficient time to develop the adjudicative expertise required for complex contested hearings;
- The 3x3 model supports succession planning through predictable turnover; and
- Extending to nine years aligns the by-law with the maximum already set out in the RHPA.

Those opposed expressed concern that:

- Nine-year terms risk governance stagnation, entrenchment, groupthink, and diminished public confidence;
- Succession challenges should be addressed through improved recruitment, onboarding, and mentoring — not longer tenure;
- Time in role should not be conflated with competence or effectiveness; and
- Six years provides sufficient time for directors to develop expertise while maintaining regular renewal of perspectives.

### **OCP Response**

The thoughtful feedback provided by respondents was appreciated and thoroughly assessed. While consultation responses were limited in number relative to the College's over 25,000 registrants, the Board considered the feedback alongside the environmental scan findings, Hearings Office data, and the Discipline Committee Chair's submission.

At its March 23, 2026, meeting, the Board approved all three motions:

- **MOTION:** THAT the Board approve the proposed by-law amendments to increase the number of elected board directors by two, consisting of one additional pharmacist and one additional pharmacy technician.
- **MOTION:** THAT the Board approve the proposed by-law amendments to extend the maximum term limits for elected board directors from six to nine years, based on the ability to complete three consecutive three-year terms.
- **MOTION:** THAT both changes take effect immediately to enable implementation for the 2026 election cycle.

Board discussion reflected a range of perspectives. Directors in support of both motions highlighted the Discipline Committee's documented capacity constraints, the statutory intent of the RHPA (which always contemplated nine-year terms), and the need to ensure a sufficient pool of qualified directors to fulfill the College's public protection mandate. Concerns raised during the discussion included the need for diversity and fresh perspectives at the Board table, low registrant engagement in elections, and the importance of defensibility. Directors who could be impacted by the upcoming election recused themselves from the discussion and vote, as the changes would affect their own tenure. These concerns were acknowledged and will inform ongoing governance improvement efforts.

The Governance Committee will continue to pursue additional mechanisms to address board and committee capacity, including formal succession planning, enhanced director development, and clearer expectations regarding director time commitment in election application materials.