

Summary of Consultation Findings

Background

CPR and First Aid training is currently recommended but not required for pharmacy technicians who are injection trained.

At its December 8, 2025 meeting, the Ontario College of Pharmacists' Board of Directors approved an open consultation on the mandatory requirement of completing and maintaining up-to-date CPR and First Aid training among all pharmacy technicians (including intern technicians) administering injections (as per Schedule 3 of *Ontario Regulation 256/24*, under *the Pharmacy Act, 1991*).

This proposed requirement supports the safe implementation of [expanded scope of practice](#) activities which would allow, if approved by government, pharmacy technicians (including intern technicians) to administer all vaccines listed in Schedule 3 of *Ontario Regulation 256/24*, under *the Pharmacy Act, 1991*.

The College held an open consultation on the proposed 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). Below is a summary of the consultation process and findings.

Public Consultation Process

With direction from the Board of Directors, this proposed requirement (approved for consultation at the December 8, 2025 Board meeting) was posted for a 60-day public consultation from January 7 - March 7, 2026.

Registrants, system partners, and members of the public were informed of the consultation through the College's website, the College's major publications and digital newsletters, targeted outreach to key system partners, and promotion through social media posts. Of note, targeted outreach to pharmacy technicians resulted in a higher than usual consultation response rate from pharmacy technicians.

The College received a total of 64 responses to the consultation. Sixty-three comments were published to the consultation page, and 1 system partner submitted a response to the consultation inbox directly. Most of the comments were received from pharmacy professionals, with 34 comments from pharmacy technicians and 27 from pharmacists. Two members of the public responded.

Summary of Comments from System Partners

In addition to receiving comments through the [consultation webpage](#), College staff invited system partners to provide feedback on the draft regulation amendments and implementation considerations. The only response received was from The Ontario Pharmacists Association's (OPA).

Overall, the OPA is supportive of establishing a CPR and First Aid training requirement for pharmacy technicians (including intern technicians) who are injection trained and intend to engage in administering vaccinations if the government so authorizes.

While OPA is in support of this requirement, additional considerations for implementation were shared:

- Consideration of the level of CPR and First Aid Certification. Currently pharmacists who administer injections are required to have certification in CPR and First Aid equivalent to St. John Ambulance or Red Cross Standard First Aid & CPR/AED Level C. Pharmacy technicians are only able to administer vaccines under supervision of a pharmacist/health care professional who also has the same certification as a pharmacist. As a result, pharmacy technicians may not require the same level of certification. The OPA indicated that the Emergency First Aid & CPR certification may be sufficient.
- Consideration for implementation. Timelines for implementation for CPR and First Aid Certification have been anticipated to align with the implementation of expanded scope activities. This may have an impact on compliance and continuity of care as pharmacy technicians may need adequate time to transition to this new requirement. For example, scheduling time off work, finding available courses. Clear communication is required of the College throughout the process of implementation.
- As part of the implementation process, consideration for public awareness approach that clearly articulates the role, scope and training of pharmacy technicians to bolster public understanding.
- Cost and remuneration should be considered as time off work may be required for certification. This may indirectly result in indirect costs where compensation for training is not provided.

Summary of Consultation Comments Received

Among the 63 individual comments to the public consultation, 27 (43%) were from pharmacists, 34 (54%) were from pharmacy technicians, and 2 (3%) was from the public.

The table below captures the general sentiment of respondents towards the proposed requirement, and shows overall responses (positive, negative, or mixed response) by respondent type.

Response Count

Response	Pharmacist	Pharmacy Technician	Public	Other Response	Total Response Count
Positive	17	24	1	0	42
Negative	5	8	1	0	14
Mixed	5	2	0	0	7

Analysis of the consultation feedback indicates strong support for the requirement of CPR and First Aid certification. Most respondents (n=42; 67%) are in support of this certification. Respondents who were supportive of the requirement largely expressed that the certification would protect the public by ensuring more pharmacy professionals are available to respond to adverse reactions and emergencies. Further, it was felt among this group of respondents that this new requirement may support the provision of additional injections in future. A few responses highlighted the importance of standardizing requirements between pharmacy technicians and their pharmacist counterparts performing the same activities. A few quotes from respondents are included below to illustrate these points:

“For the safety of the patients, all pharmacy technicians should have the CPR and First Aid training.”

“As the scope of practice for pharmacy technicians has expanded to include the administration of certain injections following completion of approved education and training, CPR certification should be recognized as an essential competency associated with this activity.”

“Supporting the “Scope of Practice” Evolution. As the RPhT scope of practice expands, so does professional accountability. With the authority to perform clinical tasks comes the responsibility to manage the associated risks.”

While there was an overall positive response to the potential requirement of CPR and First Aid certification, there were a few areas of concern raised. Some respondents felt this certification would be difficult to access due to potentially greater difficulty of accessing these certification courses in rural areas. There were also concerns related to financial implications of obtaining this certification. Specifically, taking time away from work to complete the course may result in lost wages; there is no commensurate increase in compensation for becoming certified; and pharmacy professionals will have to pay for the course. A few respondents expressed a desire for certification costs to be paid for by their employer or other sources (i.e., the College). A few quotes from respondents are included below to illustrate these points:

“I disagree with this. Unnecessarily increasing cost and burden to administer injections.”

“What is even the point of allowing pharmacy technicians to inject vaccines if none work in community pharmacies? As a hospital pharmacist, none of our pharmacy technicians inject vaccines as the nurses do it. In our community pharmacies the registered pharmacy technicians are few and far between and certainly none at the big box stores.”

OCP Response

The thoughtful feedback provided by respondents is appreciated and has been thoroughly assessed. Overall, the responses to the public consultation on this new requirement did not provide sufficient information to outweigh the benefit of having this requirement and there is

general support for its establishment. Feedback received through the consultation will inform implementation and communication considerations.

This new requirement is only mandatory for pharmacy technicians administering injections. If a pharmacy technician is not engaged in administering injections, they would not be required to obtain First Aid & CPR certification. The College acknowledges that this will vary among pharmacy practice environments (e.g., community vs hospital pharmacy vs family health team).

It will be the responsibility of pharmacy professionals to identify appropriate courses, and to manage the time and financial implications of this new requirement. Registrants may refer to the [Injection and First Aid Training Requirements](#) page on the OCP website for additional details. Work schedules and financial support to complete and maintain the required training should be discussed by the registrant with their employer, if applicable.

No specific changes are required to the draft guideline, and the outcomes of the consultation will be reviewed by the Board.