



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
de quartier**

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December 20, 2020

Ontario College of Pharmacists  
483 Huron Street  
Toronto, ON  
M5R 2R4

**RE: Neighbourhood Pharmacy Association of Canada Submission on Proposed  
Regulatory Amendments to Create Emergency Assignment Registration Certificates**

To whom it may concern,

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates this opportunity to respond to proposed regulatory amendments that would enable the creation of an emergency registration certificate class of pharmacy professionals.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations, including chain, banner, long-term care, specialty pharmacies, grocery chains, and mass merchandisers with pharmacies. We advocate for pharmacies' role in caring for Canadians, both behind and in front of the counter. We aim to advance sustainable healthcare for all stakeholders by leveraging close to 11,000 pharmacies conveniently located in virtually every community throughout the country – and over 4,500 community locations in Ontario. Pharmacies are integral points of patient care.

**Proposed Amendments**

If approved by government, the proposed amendments represent a long-term approach to allow for a nimble response to significant demand growth or disruptions that would put pharmacy services at risk. This follows earlier action by the College in response to the ongoing pandemic that allowed some pharmacists to return to practice and others, like students and interns, to work to the full extent of their scope of practice.

Given the continued pressure that the COVID-19 pandemic has placed on pharmacy workforce, and given the possibility of future situations and events that would call for a similarly rapid response to ensure Ontarians continue to have access to the pharmacy care and services they need, the College has proposed the amendments currently under consideration as a longer-term solution that would allow for an emergency registration

certificate class of pharmacy professionals to be implemented when government, in collaboration with the College, determines there is a shortage of qualified pharmacy professionals that puts access to pharmacy services at risk in an emergency situation.

Neighbourhood Pharmacies supports the introduction of emergency assignment certifications. This would be a good measure to manage the workforce needs and demands should any drastic changes take place in light of the ongoing or future emergency events. Our members have been at the front lines in this public health emergency, caring for Ontarians and providing vital services throughout the pandemic. We recognize the vital importance of maintaining access to pharmacy care and services in communities across the province, now and in any future emergencies.

### **Feedback on Proposed Changes**

Upon review of the proposed changes to the regulations, we are satisfied with the requirements that need to be met to obtain the emergency assignment certification.

We do note that Section 15.2(1).2 (page 6 of the draft regulations changes document) stipulates a requirement for emergency assignment certified pharmacists to be supervised by a Part A pharmacist. The accompanying Rationale indicates that the supervising pharmacist need not be physically present but clarity around this requirement would benefit pharmacy operators.

Pharmacy operators also require clarity on the College's role in activating emergency assignment registration certification. On page 5 of the draft regulated changes document, section 15.1(1).1, states that the Government of Ontario must request that the College issue certificates of registration for the pharmacist (emergency assignment) class. In the rationale, it is stated that the College will advise the government of such a need.

This raises several questions that must be addressed to ensure pharmacies can be adequately prepared for the issuance of emergency assignment pharmacy professionals. In general, a better understanding of the College's role and processes related to needs assessment, as well as the processes that will follow once a government request for emergency assignment certifications is activated, will be helpful. Specific questions include:

- How will this need be determined?
- Will the College determine whether pharmacists or pharmacy technicians are needed to fill the gaps in an emergency event? For example, could the College deem that only pharmacy technicians are required at a given time and only open the process to pharmacy technicians to obtain emergency assignment certification? Could it do the same with pharmacists? If so, then, how and on what basis will the College determine who will be able to access the emergency assignment certification process?
- Will there be a consultation process prior to advising the government of the need, or will the College provide advice to the government directly without consultation?

- What timelines can be anticipated for communication from the College on the initiation of the emergency assignment certification? Once the government makes a request for emergency assignment certifications to be issued, how soon can the first of the certifications be made available? This will be important to consider for existing pharmacy interns and students already in the workforce who maybe eligible for the emergency assignment certification. It will also be a critical factor in workforce planning and coverage.
- Prior to the end of the 60-day emergency assignment certification, the College will provide notice of it's intention to extend or terminate the emergency assignment certification period How many days notice will the College provide? This will be critical information for pharmacy operators as they will require sufficient time before the emergency assignment certifications are terminated to re-align their workforce needs and ensure proper coverage.

### Recommendations

1. Clarify, either through the regulations or OCP policy, that a supervising Part A pharmacist need not be physically present, in order to supervise an emergency assignment pharmacist.
2. We recommend that the College consult with pharmacy representatives, such as the Ontario Pharmacists Association and the Neighbourhood Pharmacy Association of Canada, prior to determining whether a need exists to issue emergency assignment for pharmacy professionals. This consultation will help the College determine whether there is a need for pharmacy technicians or pharmacists or both.
3. Following the issuance of the first 60-day emergency assignment certificates, we recommend that the College consult with industry representatives every 30 days, in order to determine the ongoing need for emergency certified pharmacists and/or pharmacy technicians.
4. We recommend that at least twenty-one days notice be given prior to the termination of a 60-day emergency assignment certificate.

### Conclusion

We recognize the need for workforce flexibility in a time of emergency and appreciate the work the College has undertaken, in collaboration with government and the pharmacy sector, to ensure Ontarians are able to access needed pharmacy supports and services in their communities, especially in times of emergency.

We are encouraged by the proposed creation of an emergency registration certificate class of pharmacy professionals. By addressing the questions noted above, pharmacy operators will have the clarity they need to prepare for these changes, through the ongoing pandemic and in future emergency situations.

Please do not hesitate to contact me at [shanna@neighbourhoodpharmacies.ca](mailto:shanna@neighbourhoodpharmacies.ca) should you have any questions, comments, or concerns.

Thank you,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a period at the end.

Sandra Hanna, RPh  
Chief Executive Officer  
Neighbourhood Pharmacy Association of Canada