

Dec 20, 2020

Ms. Nancy Lum-Wilson
CEO and Registrar
Ontario College of Pharmacists
483 Huron Street
Toronto, ON M5R 2R4

Dear Ms. Lum-Wilson:

Re: Proposed regulatory amendments to *General Regulation 202/94* under the *Pharmacy Act*, to allow for temporary emergency registration certificates to respond to pharmacy workforce challenges

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 recently proposed amendments to the *General Regulation 202/94* under the *Pharmacy Act, 1991*. If approved, the amendments would enable the creation of an emergency registration certificate class of pharmacy professionals.

The Ontario Pharmacists Association is committed to evolving the pharmacy profession and advocating for excellence in practice and patient care. With more than 10,000 members, OPA is Canada's largest advocacy organization and continuing professional development provider for pharmacy professionals across Ontario. 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 healthcare system.

OPA would first like to acknowledge and applaud the efforts of student leadership and others to highlight the challenges the current pandemic has placed on pharmacy licensure for students, graduates, and interns. The growing and sustained pressure of the pandemic on the healthcare system necessitates that all pharmacy professionals be able to practice to their fullest potential to support their patients and the public. To that end, OPA fully supports amendments to the *General Regulation 202/94* under the *Pharmacy Act* that would enable the creation of an emergency registration certificate class of pharmacy professionals and allow pharmacy graduates to practice without the need for direct supervision and pharmacy technician graduates to practice to their full scope.

There is an increasing demand for pharmacy professionals during the pandemic and according to the OCP COVID-19 Workforce Survey, 81% of pharmacies reported workforce challenges due to COVID-19. It is important to emphasize that pharmacy interns are highly competent with an exceptionally high OSCE pass rate of 94.1% for Canadian graduates. Noteworthy is that other health care regulatory bodies have granted conditional/emergency licensure during the pandemic to address workforce needs. There are four provinces in Canada that have granted pharmacists conditional licensure: Nova Scotia, Quebec, Manitoba, and Saskatchewan. Granting conditional licensure will prepare the College and the pharmacy profession to meet the demands of any future emergency.

To support the safe, effective, and ethical delivery of pharmacy services in Ontario, all registrants of the Ontario College of Pharmacists are expected to practice according to their responsibilities as outlined in legislation, the Standards of Practice and Code of Ethics, and reinforced through the Professional Responsibility Principles. Since registrants holding an Emergency Registration Certificate would be held to the same expectations, OPA believes that public safety will continue to be upheld to the highest standards with the introduction of this class while also ensuring the ability to respond to public health needs by supporting workforce capacity.

As it relates to emergency assignment registration certificates, OPA acknowledges the need for a readily adaptable model and one that can be renewed as necessary to address prolonged emergency events like a pandemic. Emergency assignment registration certificates, which would come into force if there is determined to be a shortage of pharmacy professionals practicing in Ontario during an emergency, would be valid for 60 days, with the potential to be automatically renewed at the discretion of the Registrar provided that the emergency and shortage persist. The Association would like to underscore the importance of continued collaboration and transparency in determining whether there is a shortage of pharmacy professionals practicing in Ontario and to ensure that pharmacy professionals practicing under an emergency assignment registration certificate are able to do so with confidence that they will be able to complete the requirements for full registration. Recognizing that there may be a potential backlog of candidates who have not completed their PEBC licensing exams as a result of an emergency situation, to ensure continuity of care and reduce disruption to the workforce, OPA suggests a transition period where pharmacy professionals practicing under an emergency assignment registration certificate may continue in that capacity after an emergency situation has resolved until any backlog of candidates has been resolved and all candidates are able to challenge the PEBC licensing exam and receive their results.

The Ontario Pharmacists Association appreciates the opportunity to provide the College with its comments and recommendations toward the proposed regulatory amendments that would allow for temporary emergency registration certificates to respond to pharmacy workforce challenges. OPA has been working on behalf of members and individuals affected by the cancellation of the PEBC OSCE because of the Public Health restrictions due to the COVID-19 pandemic to advocate for conditional licensure and to pursue a contingency plan for upcoming scheduled exams that include classifying the OSCE as an educational event and considerations for an alternate format for the OSCE examination that could serve as an interim replacement for the current model. We are committed to collaborating with all other pharmacy stakeholders to continue to support affected individuals throughout this process and ensure pharmacy professionals are enabled to practice to their fullest potential.

Should you have any questions or comments related to this submission, please do not hesitate to contact me at your earliest convenience at jbates@opatoday.com or by phone at 416-441-0788.

Yours sincerely,



Justin J. Bates
Chief Executive Officer