



Jan 10, 2024

Health Workforce Regulatory Oversight Branch
Nursing and Professional Practice Division
438 University Avenue, 10th floor
Toronto, ON M5G 2K8

Delivered by email: Regulatoryprojects@Ontario.ca

Re: Ontario College of Pharmacists' Proposed Regulation Amendments

On behalf of the Ontario Branch of the Canadian Society of Hospital Pharmacists (CSHP-OB), we appreciate the opportunity to provide feedback on the proposed regulation amendments in which Ontario College of Pharmacists hopes to streamline standards and qualifications for certificates of registration and minimum requirements for the quality assurance program.

The CSHP-OB represents Ontario pharmacy professionals, both pharmacists and pharmacy technicians practicing in collaborative healthcare settings, such as hospitals, long-term care, and primary care teams.

In regards to the **changes in the classes of certificates of registration**, we support removing the registered pharmacy student class. This registration was only used for pharmacist students as pharmacy technicians only had one member type.

With regards to **adding an intern designation for pharmacy technicians**, we are in agreement as long as the Intern technician terminology can be changed to *Intern Pharmacy Technician* to coincide with their professional designation. This will decrease confusion between other allied health professionals. In line with this change, we would suggest adding the word Pharmacist to the Intern designation.

This **Intern Pharmacy Technician class** will allow for hospitals to hire pharmacy technician students directly from colleges immediately post-graduation after they register as an Intern Pharmacy Technician and this supports them to practice at entry-level, but prior to completing all practical assessments/training.

In regards to changes in the **two-part register**, CSHP-OB agree that pharmacy technicians should be eligible for either Part A or Part B registration. CSHP-OB does query whether the 2 part register is still warranted and aligns with other healthcare professional colleges and pharmacy colleges in other provinces.

Regarding **IPG requirements, page 8, under rationale**, it states that IPG are required to have a university degree. This should be clarified to say 'a university degree in pharmacy'. The language in the proposed new clause is correct.

Re: Quality Assurance Part X, Page 35. We are supportive of pharmacy technicians be included in the quality assurance program and that both pharmacists and pharmacy technicians will shift from an hourly reporting of practice (currently 600 hours during 3 years of practice) to a self-declaration in conjunction with practice-based assessment.

For any further questions or clarifications, please feel free to contact me directly at obpresident@cshp.ca.

Sincerely,
Andrea Wist, President, CSHP-OB