

November 21, 2024

Subject: Feedback on Proposed By-law Changes

The Canadian Society of Healthcare-Systems Pharmacy – Ontario Branch (CSHP-OB) is pleased to provide feedback on the Ontario College of Pharmacists (OCP) proposed by-law changes.

In alignment with the College’s commitment to equity, diversity, and inclusion, CSHP-OB is dedicated to advocating for all pharmacy professionals, regardless of culture, background, or practice setting. This commitment is reflected not only in our recent name change but also in our ongoing collaboration with organizations representing Indigenous and Black pharmacy professionals. Through these partnerships, we aim to raise awareness and foster understanding among healthcare professionals and the public.

Support for Terminology Alignment and Inclusion

CSHP-OB supports aligning the terminology and registration classes used in the OCP by-laws with those in the Pharmacy Act to ensure consistency. To further promote inclusivity, we recommend adding pharmacy technician students to subsection 1.13 to reflect the broader scope of individuals whom registrants support and mentor.

We also strongly support the use of gender-neutral language throughout the by-laws.

Feedback on Proposed Fee Changes Support:

1. Requiring payment of outstanding cost orders or fees as a condition of registration renewal. However, we encourage the College to consider offering registrants the option of establishing a repayment plan.
2. Introducing a registration and annual renewal fee for Part B pharmacy technicians.

Seeking Clarity:

1. Whether personal or family emergencies, cyberattacks, or situations covered under the Employment Standards Act, union collective agreements, or workplace policies would be considered reasonable grounds for late cancellations of operational or practice assessments.
2. Whether alternative methods have been considered to reduce operational costs while meeting the College’s mandate. For instance, exploring more cost-effective ways to administer the Jurisprudence, Ethics, and Professionalism exams.

3. The distinction between the Pharmacy Re-inspection (compliance audit) with a proposed fee of \$450 and the Re-inspection of Community or Hospital Pharmacies, which has an existing fee of \$1,454.15.

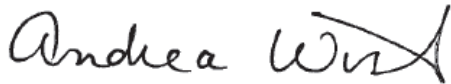
General Concerns:

CSHP-OB emphasizes the importance of assessing the potential impact of fee increases on registrants and prospective registrants, especially given the current economic challenges and health human resource shortages. We also encourage evaluating whether the College's quality assurance programs and activities are meeting desired outcomes and if these can continue to be operationalized using the current funding structure from annual registration fees.

Conclusion

CSHP-OB appreciates the opportunity to provide feedback on the proposed by-law changes. Should you require further information or wish to discuss our recommendations, please do not hesitate to contact me.

Sincerely,



Andrea Wist, RPh, BSc Phm, MBA
CSHP-OB President