



December 18, 2020

Ms. Nancy Lum-Wilson
CEO and Registrar, Ontario College of Pharmacists
483 Huron St
Toronto, ON M5R 2R4
Email: nlumwilson@ocpinfo.com

RE: Emergency Assignment Registration Certificates – Open Consultation

Dear Ms. Nancy Lum-Wilson,

I am writing to you on behalf of the Canadian Society of Hospital Pharmacists Ontario Branch (CSHP OB) in support of the proposed regulatory amendments that enable the creation of an emergency registration certificate class of pharmacy professionals to grant conditional licensure for pharmacy graduates, recently impacted by the COVID-19 public health restrictions. The Canadian Society of Hospital Pharmacists (CSHP) is a national organization committed to patient care through the advancement of safe, effective medication use in hospitals and other collaborative healthcare settings.

The class of 2020 pharmacy graduates from the University of Toronto and the University of Waterloo would have normally entered the workforce as fully licensed pharmacists by this time. However, candidates have been unable to complete their final licensing examination due to COVID-19 public health restrictions. Pharmacy students and interns are facing another delay in their licensure to practice.

As the pandemic progresses and positivity rates continue to increase, front line workers are impacted by increasing demands of health care services. These pressures are contributing to a growing concern about the strain placed upon the pharmacy workforce capacity at a time when it is important to ensure sustained access to adequate numbers of pharmacy professionals in hospitals. Hospitals are experiencing increased demand for pharmacy services due to the workload associated with continuity of non-COVID related and COVID related essential services, such as support of COVID-19 vaccine logistics and administration. Many hospital pharmacist vacancies remain unfilled, placing an additional demand on a strained work force.

Due to the uncertainty and rapidly evolving situation presented by the second wave, and the prolonged and increased demand for pharmacy services during this crisis, there has been a growing urgency to establish mechanisms that would enable a surge capacity of the pharmacy workforce to respond to public health and other emergencies, thereby mitigating the risk of an acute shortage of pharmacy professionals.

Three other provinces – Nova Scotia, Manitoba and Saskatchewan – have supported emergency licensure and registration for their affected pharmacy graduates. Additionally, there is already precedent for such conditional licensing within other health care professions in Ontario:

- “Temporary Class of Nurses” as enabled through the College of Nurses of Ontario¹
- “Restricted Certificate of Registration for Exam-Eligible Candidates” as enabled through the College of Physicians and Surgeons of Ontario²

The Canadian Society of Hospital Pharmacists is in support of the proposed regulation changes to allow for emergency assignment registration for Pharmacists and Pharmacy Technicians with an expedited review, as they are essential frontline healthcare workers in this fight to battle the COVID-19 pandemic.

Should you have any questions, please do not hesitate to contact me at your earliest convenience.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Olivia Ng', with a stylized flourish at the end.

Olivia Ng
President, CSHP Ontario Branch

¹<https://www.cno.org/en/become-a-nurse/classes-of-registration/temporary-class> (Accessed December 14, 2020)

²<https://www.cpso.on.ca/Physicians/Registration/Registration-Policies/Restricted-Certificate-of-Registration-for-Exam-El> (Accessed December 14, 2020)