



The Pharmacy Examining Board of Canada

Le Bureau des examinateurs en pharmacie du Canada

717 Church Street, Toronto, ON M4W 2M4 · Tel (416) 979-2431 · Fax (416) 599-9244 · www.pebc.ca

January 13, 2021

Hon. Christine Elliott
Minister of Health &
Long-Term Care

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Hon. Ross Romano
Minister of Colleges &
Universities

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Dr. David Williams
Chief Medical Officer of Health

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Dear Ministers Elliott, Romano & Dr. Williams,

The Pharmacy Examining Board of Canada (PEBC) and the undersigned organizations are seeking the government's support to help ensure that the province of Ontario continues to have access to qualified pharmacy professionals, pharmacists and pharmacy technicians, by permitting PEBC to conduct its national licensure performance examination program.

PEBC understands and fully supports the provincial government's goal of curtailing the COVID-19 pandemic and is committed to administering its examinations with the safety of all participants as its top priority. However, the lack of clarity about how to classify the examinations within the context of Ontario's public health regulations prevented PEBC from administering the pharmacist examination to the full complement of candidates this past November which resulted in the delay of registering up to 400 Ontario pharmacists.

Given the high reliance on pharmacy professionals in the health care system and the tremendous role they can play with the implementation of the vaccination program, it is imperative that Ontario support PEBC by clarifying its regulations to allow for the administration of post-graduate licensure examinations for front-line health professions. Please review the attached document for further details.

To mitigate further delays in the licensure of these important health professionals, most of whom would be seeking licensure in Ontario, PEBC has scheduled a supplementary pharmacist performance examination on February 28, 2021. An expedient response by January 28th would be beneficial to prevent PEBC from cancelling the examination causing a further cascading backlog for this year's graduates.

We look forward to a positive and productive response.

John Pugsley, B.Sc. Phm., R.Ph., ACPR, Pharm.D.
Registrar-Treasurer – The Pharmacy Examining Board of Canada



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With endorsement from the Ontario Pharmacists Association, The Leslie Dan Faculty of Pharmacy - University of Toronto, the University of Waterloo School of Pharmacy, as well as the University of Toronto Pharmacy Class of 2020 and the University of Waterloo Pharmacy Class of 2020 and the Canadian Society of Hospital Pharmacists – Ontario Branch.

Enclosure: Briefing Note re Classification of Pharmacy Licensure Exams as Post-secondary Activities

cc:

Laurel Brazill – Director, Stakeholder Relations

Ari S. Laskin – Chief of Staff to Minister Romano

Sean Court – Assistant Deputy Minister, Strategic Policy, Planning & French Language Services (Health)

Allison. Henry - Director, Health Workforce Regulatory Oversight

Irwin Glasberg – Ontario’s Fairness Commissioner

Nancy Lum-Wilson, Registrar and CEO – Ontario College of Pharmacists



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DATE: January 13, 2021

RE: Classification of Pharmacy Licensure Exams as Post-secondary Activities

Approval Sought

That the national pharmacist & pharmacy technician licensure performance examinations [Qualifying Examination Part II (OSCE / OSPE)] offered by the Pharmacy Examining Board of Canada be classified as essential postgraduate health-related assessments and subject to the same public health restrictions/exemptions as post-secondary institutions, regardless of where the examinations are administered.

Pharmacy Professionals During the Pandemic

Pharmacists and pharmacy technicians continue to perform a significant role as front-line care providers for the benefit of Ontarians during this pandemic, in various practice areas, including community pharmacies, hospitals, primary care settings and long-term care homes. Pharmacy professionals are highly accessible care providers who have been an invaluable resource to the public. Furthermore, as Ontario proceeds with its COVID-19 vaccine preparation, distribution and administration plans, pharmacists are actively participating in this initiative in Ontario hospitals and are well-placed, and have the expertise, to maximize access to the delivery of the vaccine across the province as COVID-19 vaccine rollout expands to primary health care settings.

As has occurred across the healthcare system, the high reliance on pharmacy professionals during this extended pandemic, and the increased demand on their services, has caused strain on these professionals and it is important to ensure that there is an appropriate supply of qualified professionals to maintain high quality care. Indeed, Minister Romano emphasized this very point in his memorandum dated December 4, 2020, entitled “Stage 1 Rules – In-Person Capacity Limits for Postsecondary Education Institutions” when he explained the rationale behind the recently amended capacity limits for certain health-related programs:

The intention of these regulatory changes is to ensure the ongoing availability of postsecondary graduates in front line health-related programs that support the healthcare workforce response to COVID-19, while continuing to prioritize the health and safety of postsecondary students, faculty and staff.

This is an admirable and important goal. However, it cannot be achieved unless postsecondary graduates are then able to take the required examinations in order to become licensed. One of the obstacles to ensuring an adequate supply of pharmacy professionals to support the healthcare workforce response to COVID-19 is the lack of clarity in the provincial regulations regarding how they impact the Pharmacy Examining Board of Canada’s ability to administer its in-person, post-graduate

licensure performance exams, which are required for registration as pharmacists and pharmacy technicians in Ontario.

While proposed regulations to approve an emergency registration certificate class of pharmacists and pharmacy technicians is expected to be submitted by the Ontario College of Pharmacists in the coming weeks, this is more of an interim solution until candidates are able to complete their remaining registration requirements for full licensure, such as PEBC's performance examinations.

Background

The Pharmacy Examining Board of Canada (PEBC) is the national certification body for the profession of pharmacy and administers distinct Qualifying Examinations as the entry-to-practice licensure exams for all candidates seeking to become registered as pharmacists or pharmacy technicians in Ontario. These exams are necessary and relevant requirements for the registration of pharmacy professionals to ensure that they can practice safely and effectively. PEBC administers its exams on behalf of the Ontario College of Pharmacists, and other provincial pharmacy regulators across the country.

In the performance exams, candidates progress through a circuit of individual stations including interactive (simulated practice simulations) and task-based, non-interactive stations. In interactive stations, candidates mimic workplace interactions by role-playing with trained Standardized Patients or Health Professionals who follows standardized protocols and case-specific scripts. There is no physical contact between candidates and simulated clients.

OSCE During the Pandemic

PEBC is committed to doing everything possible to administer its exams successfully, placing the safety and well-being of candidates, exam personnel, and PEBC staff at the forefront, while maintaining the integrity of its exam processes and helping to provide much-needed licensed pharmacy professionals in this critical time.

Since the spring of 2020, PEBC made significant modifications to the design and protocols of the exams to allow the exams to proceed safely, which included the following principles:

- Strictly control candidate movement during the examination
- Restrict entry of individuals who show signs of or are at risk of infection
- Utilize personal protection equipment and measures: All personnel and candidates will wear ASTM Level II Surgical Masks
- Conduct enhanced sanitization of common areas and materials
- Allow for and maintain physical distancing (max. 3 participants per station)
- Minimize the number of individuals and their duration on-site

Since September 2020, PEBC has been able to successfully administer the OSCE and OSPE across the country to a total of 1700 candidates with no reported COVID cases.

Regrettably, due to the changing regulations and a highly restrictive interpretation of the regulations received from a municipal public health authority shortly before its November 2020 exams, PEBC was forced to cancel its Toronto examination and reduce its Ottawa examination by 50%, which led to 120 scheduled candidates not being able to take the examination in those centres. This is in addition to almost 300 backlogged Ontario candidates who were not offered a spot for the examination due to

capacity restraints. While PEBC was able to proceed with the majority of its November 2020 examinations across the country resulting in approximately 1000 candidates being able to successfully attempt the examination, the required cancellations in Toronto and Ottawa and significant backlog has left Ontario uniquely at risk of being negatively impacted by a shortage of licensed pharmacists at this critical time.

PEBC is exploring a virtual option for its performance exams; however, given the time needed to evaluate and implement this modality, and the urgent need to assess pharmacy candidates, PEBC has continued to prioritize its live performance exams.

Alignment of Classification with Post-Secondary Institutions

While PEBC is not a post-secondary institution, PEBC examinations are of an educational nature being the final high stakes assessments that candidates must successfully complete (after completing their post-secondary education) before becoming licensed as pharmacists/pharmacy technicians. PEBC submits that there is no principled distinction between it and post-secondary institutions for the purpose of the relevant regulations made under the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020*. On the contrary, the recent amendments that provide broader exemptions for certain prescribed health-related programs (including “Pharmacy/Pharmacy Technician”) would be undermined if these exemptions only allowed pharmacy/pharmacy technician students to graduate, yet not become licensed by virtue of the fact that they could not take PEBC’s examinations.

Given its important role (especially in Ontario due to the number of candidates in Toronto and Ottawa who were unable to attempt the November 2020 OSCE) and its strong commitment to safety measures (as demonstrated by its track record of administering its examinations during the COVID-19 pandemic across the country without incident), PEBC seeks to be deemed to be a “post-secondary institution” (or equivalent) for the purpose of Schedule 2, Subsection 2(2) of Ontario Regulation 82/20 (and the related regulations made under the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020*) so that it can continue to administer its examinations in support of the province’s goal of ensuring the availability of front line health professionals such as pharmacists and pharmacy technicians.

Further, as PEBC administers its examinations at various locations including at Universities, Outpatient Hospital Clinics and at hotels using multiple guest rooms for OSCE stations (depending on the needs/facilities available in various centres), PEBC also seeks to ensure that any venue providers (be they Universities, Outpatient Hospital Clinics, hotels, or otherwise) not be prevented from providing space to PEBC in order for it to administer its examinations provided that PEBC complies with all requirements applicable to post-secondary institutions. One potential way to achieve this objective would be to include “the provision of in-person teaching, instruction, or examinations by or on behalf of a post-secondary institution” (as amended to include PEBC) as a permitted use of rented meeting or event space under Schedule 1, Section 7 of Ontario Regulation 82/20.

PEBC respectfully requests that the Ministry approve the classification of PEBC as a post-secondary institution (or equivalent) to allow PEBC to continue its important work in supporting the availability of qualified pharmacy professionals when the province needs them most.