



ONTARIO  
PHARMACISTS  
ASSOCIATION

## Office of the Chief Executive Officer

November 12, 2020

The Honourable Christine Elliott  
Deputy Premier and Minister of Health  
777 Bay Street, 5<sup>th</sup> Floor  
Toronto, ON M7A 2J3

The Honourable Ross Romano  
Minister of Colleges and Universities  
438 University Avenue, 5<sup>th</sup> Floor  
Toronto, ON M7A 1N3

Dear Deputy Premier Elliott and Minister Romano,

I am writing to you on behalf of the Ontario Pharmacists Association, representing more than 10,000 pharmacy professionals across Ontario to inform you of a developing issue in pharmacy and request a meeting to discuss on how we can work on a solution together.

A subset of the class of 2020 pharmacy graduates from Ontario's accredited pharmacy schools - the University of Toronto and the University of Waterloo - have been unable to complete their licensure to practice due to COVID-19 public health restrictions and the inability of the Pharmacy Examining Board of Canada (PEBC) to immediately shift the final licensing examination format to a virtual assessment.

As stated, these graduates have completed all of their professional coursework and the written portion of their licensing exam, but need to complete an in-person Objective Structured Clinical Examination (OSCE) administered by the PEBC. The OSCE simulates the clinical work of a pharmacist to complete their eligibility for licensure with the Ontario College of Pharmacists. The first exam was cancelled in May, when full lockdown restrictions were implemented in the early days of the pandemic. The cohort of graduates, along with an additional group of pharmacy interns, were then relegated to the next scheduled examination date of November 8. Once again, strict public health policies, guidelines and regulations – this time in the city of Toronto and Ottawa – required a second cancellation. The necessity of the November 8 exam in the city of Toronto stemmed from the fact that Toronto Public Health (TPH) interpreted the provincial regulations in a way that classified this exam session as a “meeting” or “conference” rather than an educational event. PEBC organizers confirmed with TPH that they were able to host the event and abide by and even exceed the necessary safety protocols required in a manner that was acceptable in other Ontario and Canadian jurisdictions.

With two cancellations already experienced, this growing cohort of fully trained pharmacy professionals are concerned that there may be no guarantee they can be accommodated for the next examination date in February 2021. With each scheduled session of the national exam, new pharmacy graduates enter the pool of candidates awaiting their final step in their long educational pathway – the opportunity to challenge the national exam and the ability to practice as fully licensed pharmacists as regulated by the Ontario College of Pharmacists.

As a result of these cancellations and potentially future pandemic-related cancellations, exacerbated by a growing queue of test candidates, the graduates of the class of 2020 are stuck in limbo and may even merge with the class of 2021. The result is that despite having completed their studies, they are unable to work independently as full pharmacists and require direct supervision by another licensed pharmacist. In addition, as interns, they will be subject to significantly lower wages at a time when they are trying to pay back significant student loans and secure gainful future employment in their field.



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At a time when we desperately need more front-line healthcare providers, we propose three policy and regulatory changes to quickly remediate this issue:

1. The Ontario government, working with the Ontario College of Pharmacists, grant conditional licensure until they successfully challenge the final OSCE assessment. This could be accomplished in a variety of ways, including regulatory changes to the *Pharmacy Act, 1991*, or the College's approval of an alternative evaluation method. Three other provinces – Nova Scotia, Manitoba and Saskatchewan – have for their affected graduates. There is already precedent for such conditional licensing within the nursing and medical professions in Ontario:
  - “Temporary Class of Nurses” as enabled through the College of Nurses of Ontario<sup>1</sup>
  - “Restricted Certificate of Registration for Exam-Eligible Candidates” as enabled through the College of Physicians and Surgeons of Ontario<sup>2</sup>
2. We ask that the categorization of the examination be changed so that occupancy restrictions do not have the same impact on the graduates' ability to complete the practical component of their licensing examination.
3. Through OSAP, the government provide some student loan deferral/relief for the duration of the conditional license and up to the date of full licensure, at which point they could begin to earn a full pharmacist's wage.

I look forward to meeting with you to discuss this issue further and hope we can work together to come to a resolution that will provide pharmacy graduates with the license toward which they have worked so hard.

Sincerely,

A handwritten signature in black ink, appearing to read "Justin J. Bates", with a long horizontal flourish extending to the right.

Justin J. Bates  
Chief Executive Officer

cc: The Honourable Christine Elliott, Deputy Premier and Minister of Health  
Helen Angus, Deputy Minister of Health  
Greg Orencsak, Deputy Minister of Finance  
Patrick Dicerni, Assistant Deputy Minister and Executive Officer, Drugs and Devices,  
Ministry of Health  
Sean Court, Assistant Deputy Minister, Health Transformation, Ministry of Health  
Jen Baker, Chair, Board of Directors, Ontario Pharmacists Association  
Allan Malek, Executive Vice-President and Chief Pharmacy Officer, Ontario  
Pharmacists Association

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<sup>1</sup> <https://www.cno.org/en/become-a-nurse/classes-of-registration/temporary-class> (Accessed Nov.12/20)

<sup>2</sup> <https://www.cpso.on.ca/Physicians/Registration/Registration-Policies/Restricted-Certificate-of-Registration-for-Exam-El>  
(Accessed Nov.12/20)