



ONTARIO
PHARMACISTS
ASSOCIATION

Office of the Chief Executive Officer

November 20, 2015

Ontario College of Pharmacists
Re: Open Consultation Feedback
483 Huron Street
Toronto ON M5R 2R4

[e-mail: consultations@ocpinfo.com](mailto:consultations@ocpinfo.com)

Dear Mr. Moleschi:

RE: Proposed Revisions to By-Law No.3 – Fees and Public Register

The Ontario Pharmacists Association (OPA or the “Association”) welcomes the opportunity from the Ontario College of Pharmacists (OCP or the “College”) to comment on the proposed revisions to By-Law No. 3.

The Ontario Pharmacists Association represents the interests of Ontario’s pharmacists, pharmacists-in-training and pharmacy technicians. Our more than 9,500 members work in a wide variety of settings, including but not limited to community pharmacies, hospitals, long-term care, family health teams, and industry. The Association maintains as a key element of its mandate the support for pharmacists in the delivery of the highest quality of care for all Ontarians.

The Association acknowledges that with the growing reliance on pharmacy professionals for the delivery of front line healthcare in community pharmacies, hospitals, long-term care facilities, and retirement residences, it stands to reason that the role of the College should expand in a commensurate fashion to ensure pharmacists, pharmacy technicians and the sites in which they practice meet the prevailing legislation, standards, policies and guidelines.

With respect to the proposed changes to By-Law No. 3 as they relate to the Public Register, OPA recognizes the need for the amendments to better align with the Drug and Pharmacies Regulation Act (DPRA) and has no comments regarding the modified, new or deleted language as presented.

Regarding the changes to By-Law No. 3 related to member fees, the Association recognizes that fee increases may be justifiable if the role and day-to-day work of the College has changed substantially in response to an actualized expansion of pharmacists’ scope of practice. With such expansions in scope come increases in responsibility, accountability and liability; it is therefore understandable that fees could increase to account for a higher degree of the necessary regulatory oversight by the College. Conversely, fee increases that go beyond cost of living adjustments would not be justifiable if in the absence of significant scope of practice change.



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Members: Annual Renewal Fees

The Ontario Pharmacists Association is pleased to see that there are no proposed changes to the annual renewal fees for pharmacists or pharmacy technicians. OPA is further asking the College to explore a reduction of the annual renewal fees, and to give consideration to trends in the employment market, in particular, on the status of pharmacist and pharmacy technician wages.

Applicants: Registration Fees

The Association is pleased to see the elimination of the Structured Practical Training (SPT) fees of \$410.

Community Pharmacies: Application and Annual Renewal Fees

OPA questions the justification of and seeks rationale for the doubling of application fees from \$250 to \$500 for new store openings or changes in ownership.

Hospital Pharmacies: Application and Annual Renewal Fees

The Ontario Pharmacists Association acknowledges and fully supports the substantially new role for the College to license and inspect pharmacies within Ontario's clinics and hospitals. OPA also recognizes the importance of aligning the approach with hospitals and clinics with the flat-rate structure in place for community pharmacy fees. OPA's main concern in this regard is the rationale for the significant amount of the application, issuance and renewal fees in this sector of practice, knowing that both the general hospital and pharmacy department budgets are typically constrained.

Conclusion

The Ontario Pharmacists Association appreciates the opportunity to comment on the proposed changes to By-Law No. 3 as they relate to amendments to the Public Register and to member fees. As mentioned above, the Association is primarily seeking answers to the rationale and considerations that went into the calculations of some of the proposed fees.

Should you have any questions or comments with respect to this submission, please do not hesitate to contact me at your earliest convenience.

Yours truly,

A handwritten signature in black ink, appearing to read "Dennis A. Darby".

Dennis A. Darby, P.Eng., ICD.D
Chief Executive Officer

cc: Sean Simpson, Chair of the Board of Directors, Ontario Pharmacists Association
Allan H. Malek, SVP, Professional Affairs, Ontario Pharmacists Association
Anne Resnick, Deputy Registrar, Ontario College of Pharmacists