



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

Office of the Chief Executive Officer

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Jeana Wendel, BSc., BSc. Pharm., MHA.
Registrar
Saskatchewan College of Pharmacy Professionals
1964 Park Street, Suite 100
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RE: Supplemental Policy for Pharmacy Managers

Dear Jeana,

Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to provide feedback to the Saskatchewan College of Pharmacy Professionals on the Supplemental Policy for Pharmacy Managers. The policy imposes a burden on pharmacy managers and proprietors and may make it more difficult to staff pharmacies in Saskatchewan, however, we believe there are several areas where changes will lead to better implementation of the policy.

Pharmacists can accumulate many hours of practical experience in a community pharmacy during their training. In particular, graduates of the Doctor of Pharmacy program are required to complete a minimum of 1,280 hours of direct patient care and may accumulate up to 1,600 hours of practical experience in a community pharmacy setting. Not only do prospective pharmacists learn the mechanics of the profession, they also become familiar with the business operations, workflow and regulatory environment that governs pharmacy. This is valuable experience that pharmacists employ throughout their careers and should not be discounted. Credit for this experience should be applied to the 2,000 hours required to become a pharmacy manager as described in Section 2.1.

Sections 2.3.1 and 2.3.2 propose that new pharmacy managers and current pharmacy managers must complete a CCCEP pharmacy management training program. There is significant overlap between the course content required in the Doctor of Pharmacy program and the CCCEP accredited management training course. We recommend that graduates of an accredited Doctor of Pharmacy program be given credit for pharmacy management coursework completed in the pursuit of their degree.

Re-certification of the Saskatchewan specific module every three years seems to be excessive. It is hard to imagine that there could be such a significant change in content that re-certification would be required on such a frequent basis. Practicing pharmacists are already required by the SCPP Code of Ethics to "*maintain a high standard of professional competence throughout his practice, through continuation of his education and professional experience*". We recommend that the requirement to recertify be removed.

In the proposed policy, pharmacy managers are expected to maintain a physical presence in the pharmacy (Sections 3.1 and 3.2). The proposal of at least 30 hours per week, with at least 15 hours in the active practice of pharmacy, is more than necessary to fully understand the operations of the pharmacy. Furthermore, the policy also includes a long list of required activities (Section 3.4) which do not involve direct patient care. Managers may also have responsibilities other than dispensing, making it difficult to achieve the required hours. We recommend that the physical presence in the pharmacy requirement be reduced to 20 hours per week, of which half must be in the active practice of pharmacy.

Neighbourhood Pharmacies represents the full range of pharmacies including chain, banner, long-term care, and specialty pharmacies, as well as grocery chains and mass merchandisers with pharmacies. Our focus is on improving the delivery of care. We also advocate for pharmacies' role in caring for Canadians, behind and in front of the counter. We aim to advance healthcare for Canadians by leveraging close to 11,000 pharmacies conveniently located in neighbourhoods throughout the country as integral points of patient care.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Hanna', written over a light blue horizontal line.

Sandra Hanna
Chief Executive Officer