



SASKATCHEWAN
COLLEGE OF
PHARMACISTS

THE BUSINESS PLAN
for the
Regulation of Pharmacy Technicians
by the
Saskatchewan College of Pharmacists

Submitted to the Council of the
Saskatchewan College of Pharmacists

Pharmacy Technician Regulation Advisory Working Group

September 18, 2009

Business Plan for the Regulation of Pharmacy Technicians in Saskatchewan

EXECUTIVE SUMMARY

The Pharmacy Technician Regulation Advisory Working Group was tasked with developing a regulatory framework similar to the Ontario College of Pharmacists (OCP) model.

Purpose (From the working group's terms of reference)

The Advisory working group will act to assist the Registrar, with the development of a regulatory framework for the regulation of pharmacy technicians in Saskatchewan.

This business plan is to provide Council with an estimate of the cost implications for the Regulations of Pharmacy Technicians by the Saskatchewan College of Pharmacists.

Objectives

To prepare a Business Plan for Council for regulation of pharmacy technicians based on a thorough understanding of current environments and future recommendations from the group.

- a) Education including initial education and continuing education, bridging etc.
- b) Administrative processes (College office)

The Working Group had access to and referenced the following documents in the preparation of this Business Plan:

- a) The College of Pharmacists of British Columbia (CPBC) document, *Regulation of Pharmacy Technicians - Business Case Analysis*.
- b) The Saskatchewan College of Pharmacists working group document, *Pharmacy Technician Regulation in Saskatchewan: Concept Paper for Regulatory Framework*
- c) The Saskatchewan College of Pharmacists *Strategic Plan 2007 – 2011*.

There are many areas that were extensively debated within the working group itself. There are issues where the group was unable to come to consensus i.e. who would cover the costs of development and initial registration.

The working group has included for your information only, the estimate for development and delivery of a bridging program that has been implemented in Ontario. The College of Pharmacists of British Columbia and the Alberta College of Pharmacists are currently in negotiations with CON*NECT (Colleges of Ontario Network for Education and Training) Strategic Alliances to partner with them on their program.

This business plan does not address salary expectations for the registered pharmacy technician nor remuneration increases for increased clinical functions of pharmacists.

1. Background

During the Saskatchewan College of Pharmacists' (SCP) strategic planning session held in September 2007, one of the strategies going forward was to "Regulate" Technicians. The milestones set at that session were:

Year 1 (2007)

- ensure SCP supports technician certification and licensing
- set standards of practice for technicians
- collaborate in development of a national standard for technicians

Year 2 (2008)

- technician certification, regulations and licensing

Year 3 (2009)

- technicians are "certified"

Year 4 (2010)

- technicians responsible for the dispensing function

There has been some delay due to the College awaiting work conducted on the national level.

Council determined that the College develop the *SaskTech* document with a gradual move to regulation by the SCP (modelled after the initiatives in Ontario where technicians are to be registered as members in the OCP with independent scope of practice and title protection). The *SaskTech* document was designed initially to assist pharmacy managers to determine the level of knowledge of pharmacy assistants. This document has been used as a screening tool for hiring decisions as well as a tool to determine an assistant's level of competence for ongoing monitoring.

Council further agreed to communicate as soon as possible to all stakeholders the decision to pursue enhancements to delegation of tasks to assistants as a short term measure. Further, that we expedite steps to implement pursuing amendments to *The Pharmacy Act, 1996* to expand the College's authority over regulating technicians, similar to Ontario (i.e. register and licence technicians as members into an independent scope of practice with title protection) as the longer term model.

Council has tasked the College's Professional Practice Committee (PPC) with the development of a regulatory framework for the regulation of pharmacy technicians. The PPC then established a Pharmacy Technician Regulation Advisory Working Group made up of invited representation from various stakeholder groups to develop the framework. Meeting monthly between May 2009 and September 2009, the working group prepared a Concept Paper for Council and this Business Plan.

The working group reviewed information from provincial, national and international sources. All indicators reflect that there is now and will be for some time a shortage of pharmacists in Canada. To ensure that pharmacists have the necessary resources to function at their full scope of practice some of the distribution workload can and should be relinquished into the capable hands of a skilled, knowledgeable regulated pharmacy technician. A regulated pharmacy technician would be responsible and accountable for the technical duties so necessary for the safe and efficient distribution of medications and medical devices.

2. Assumptions

The business plan is based on the following **assumptions**:

1. There are initiatives underway in other Canadian jurisdictions, but there is no complete national model for the regulation of Pharmacy Technicians.
2. Only candidates who have graduated from a CCAPP accredited program or candidates who have successfully completed the bridging programs as approved by Council and have passed the national PEBC qualifying examination for pharmacy Technicians, will be eligible for registration with the College.
3. There will be no “grandfathering” clause for individuals who currently hold a diploma or certificate from a pharmacy technician training program.
4. Not all persons currently employed as “pharmacy technicians” will choose to become registered and will remain as pharmacy assistants.
5. The guiding principle is that pharmacists will be engaged in non-technical, patient-centered roles.
6. That the registration and annual membership fees of pharmacist members will not be used to subsidize pharmacy technician fees.
7. That the management of finances be transparent.
8. That the costs for the regulation of pharmacy technicians (beyond initial start-up costs) be self-sustaining.
9. That all assistant candidates seeking registration and membership with the Saskatchewan College of Pharmacists will pay an initial registration fee and an annual membership fee.
10. The suggested initial registration fee to be \$255.00. There will be an annual fee assessed for pharmacy technicians set by Council.
11. All practising pharmacy technicians must hold acceptable malpractice insurance which provides a limit for each claim of a minimum of one million dollars.
12. That the current complement of College staff and office space should be able to absorb the increased workload for pharmacy technician regulation initially as the number of pharmacy assistants seeking registration with the College is expected to be low.

3. Communication Strategies

The following strategies are contemplated:

- Newsletter articles to members and assistants
- Develop and distribute survey to assistants
- Member consultations (district meetings)
- Pharmacy assistant consultations
- Stakeholder consultations
- Video (purchase and adapt video from the New Brunswick Pharmaceutical Society)
- Posters, pamphlets

It is recommended that the College develop a database to capture contact information from current pharmacy assistants who may wish to receive updates from the College as we move forward.

During the summer months of 2009, the Pharmacists' Association of Saskatchewan (PAS) conducted a survey of current pharmacy assistants requesting their contact information. Together with this information and suggestions from a member of the working group who has been working with SCP staff, we have developed a spreadsheet that can be accessed via the web for sharing this information.

4. Bridging Programs

As noted in the Concept Paper, the Ontario College of Pharmacists has partnered with CON*NECT (Colleges of Ontario Network for Education and Training) Strategic Alliances to offer pharmacy technician bridging programs. CON*NECT will aid CCAPP accredited pharmacy technician programs.

The Saskatchewan Ministry of Education historically funds The Saskatchewan Institute of Applied Science and Technology (SIAST) to deliver bridging programs. Any development money approval would have to be included in SIAST's annual budget cycle. Traditionally all such programs are delivered on a cost-recovery basis.

The estimated costs for two years of aid from CON*NECT programming is \$296,125 based on estimates given to CPBC and ACP. CON*NECT requires content specialists to adapt the curriculum for Saskatchewan. CON*NECT will also provide on-line versions of the courses for Saskatchewan to allow bridging program delivery at distance.

The SME (subject matter expert) review and aid in adapting the curriculum would place an additional cost of \$52,000. SME refers to SIAST's estimated cost of developing/adapting one of the courses.

CON*NECT programming	\$296,125.00
SME curriculum adaptation	\$ 52,000.00

5. Risks/Variable Factors

- number of pharmacy technicians seeking regulation is unknown
- timelines are dependent on government approval
- final costs to candidates will impact on the number of applicants. This includes costs of bridging programs, costs of the PEBC exams, and costs to register with the College
- accessibility and availability of bridging programs i.e., will modules (other than the lab work) be offered via distance learning; # of places available for lab work is dependent upon availability of lab facilities and instructors
- perception of a role for unregulated assistants i.e. those that choose not to pursue regulation
- acceptance of a new health professional by employers, government and the public
- availability of PEBC evaluating examination for those who have not graduated from CCAPP accredited program i.e. projected cut-off by PEBC is 2015

6. Projected Start-Up Costs

Projected costs 2009 (initial)

Develop regulatory framework (concept paper & business plan)	\$14,000.00
Communications	\$10,000.00 - \$25,000.00
Newsletter articles to members and assistants	
Develop and distribute survey to assistants	
Member consultations (district meetings)	
Pharmacy assistant consultations	
Stakeholder consultations	
Stakeholder consultations	
Video (purchase and adapt video from the New Brunswick Pharmaceutical Society)	
Posters, pamphlet	
Act & Bylaw Development	
Legal	\$25,000.00 - \$100,000.00*
Administrative	\$10,000.00
Development of registration processes **	\$1,000.00 - \$50,000.00
Database	
Computer upgrades	
Office supplies	
Website additions	
TOTAL	\$60,000.00 - \$200,000.00

* Legal estimate range based on recent costs for Regulation of the Saskatchewan College of Respiratory Therapists and the Saskatchewan College of Midwives.

** Current database may be sufficient with minor upgrades
Computer upgrades such as new terminals if additional staff warranted.

7. Projections for New Registrants, Renewals and Fees.

	Registrants (New)	Renewal	Total Members	Registration Fees	Membership Fees	TOTAL FEES
Year One	35	0	35	\$8,925.00	\$14,000.00	\$22,925.00
Year Two	60	35	95	\$15,300.00	\$39,140.00	\$54,440.00
Year Three	60	95	155	\$15,300.00	\$65,720.00	\$81,020.00
Year Four	60	155	215	\$15,300.00	\$93,955.00	\$109,255.00
Year Five	30	215	245	\$7,650.00	\$110,250.00	\$117,900.00
TOTAL	245	245	245	\$62,475.00	\$323,065.00	\$385,540.00

Fees: assume a Registration fee of \$255.00 and an initial membership fee of \$400.00 with an annual increase of 3%. (\$400.00, \$412.00, \$424.00, \$437.00, \$450.00)

Conservative estimates utilized above. However, should a large employer, for example SAHO establish that the majority of their current pharmacy assistant work force must hold a practising licence from the College then these numbers would increase sharply (i.e. 179 pharmacy assistants working in SAHO positions as of April 2009).

These totals also assume a balance between the number of members leaving the profession or the province with the number moving into the province under the Labour Mobility agreements across the country.

8. Conclusion

The Pharmacy Technician Regulation Advisory Working Group was tasked with the development of a regulatory framework for Pharmacy Technicians in Saskatchewan within the Saskatchewan College of Pharmacists. This Business Plan has been developed with estimates from previous work undertaken by the College and with information from the College of Pharmacists of British Columbia document *Regulation of Pharmacy Technicians - Business Case Analysis*.

There are many factors that impact on the cost to develop and implement such a framework. The Working Group acknowledges that due to the number of unknown factors such as facility and instructor availability for bridging programs, numbers of applicants, and perhaps even acceptance by pharmacists, employers and the public, the rate at which the number of assistants applying for regulation as a Pharmacy Technician is difficult to quantify.

While we are unable to give an exact cost for development and implementation of such a regulatory framework, we have allowed for the best and worst case scenarios. In order to ensure that pharmacists have the necessary resources to function at their full scope of practice, we must relinquish the technical and distribution workload to skilled and knowledgeable health care professionals, the regulated pharmacy technicians.