

Emergency Registration and Licensure - Supplemental Policy

PURPOSE

Saskatchewan College of Pharmacy Professionals (SCPP) Regulatory Bylaws have been amended to enable and expedite emergency registration and licensure, in extraordinary circumstances, for retired, associate, non-practising members, any person who has been previously registered with the College who has let their membership lapse and persons who are registered as practising members in good standing with any other Canadian pharmacy regulatory authority.

Individuals who are licensed through these bylaws will receive a “temporary practising member” licence in accordance with the terms, limitations and restrictions/conditions specified by the Registrar as approved by Council.

This policy outlines the eligibility criteria, registration and licensure requirements, terms and conditions of practice, that the Registrar will use in making these decisions to implement the bylaw.

POLICY

1. Extraordinary Circumstances

Extraordinary circumstances, for the purpose of enacting emergency registration and licensing include, but are not limited to:

- 1.1. An emergency situation exists as declared by the provincial or federal government;
- 1.2. A shortage of pharmacists or pharmacy technicians regionally, provincially, or nationally that impacts the availability of qualified pharmacists or pharmacy technicians; or,
- 1.3. A demonstratable increase in the demand for pharmacists or pharmacy technicians that impacts the availability of licensed pharmacists or pharmacy technicians.

2. Eligibility Criteria

Unless otherwise specified by the Registrar, the following criteria will be used to determine eligibility for granting a temporary practising licence, under emergency registration and licensure provisions for the following membership categories:

- 2.1. Retired, associate, and non-practising members who had an active licence with the College within the last three years;
- 2.2. Any person who has been previously registered with the College who has let their membership lapse within the last three years;
- 2.3. Persons who are currently registered as a practising member, or its equivalent, with another Canadian pharmacy regulatory authority and in good standing;

- 2.4. Must be in good standing and have not had their licence revoked by the College;
- 2.5. Must practise within any conditions established as a result of a complaint or discipline process.

3. Registration and Licensure Requirements

3.1. Process for Temporary Practising Licence

A temporary practising licence will be issued in accordance with the registration requirement and fees as specified by the Registrar and may be waived at the discretion of the Registrar as approved by Council.

- 3.2. Unless otherwise specified by the Registrar, a member granted a temporary practising licence:

- 3.2.1. Must have professional liability insurance;

- 3.2.2. Must provide a valid criminal record check or such other information from law enforcement.

3.3. Training Requirements and Continuing Professional Development

- 3.3.1. Registrants applying for a temporary practising licence must complete educational requirements as determined by the Registrar, which may include:

- 3.3.1.1. Minor Ailments;

- 3.3.1.2. Information related to the declared emergency; and

- 3.3.1.3. Other requirements as determined by the Registrar.

- 3.3.2. Registrants applying for a temporary practising licence, who are currently registered as a practising member, or its equivalent, with another Canadian jurisdiction, must also complete:

- 3.3.2.1. The Saskatchewan Jurisprudence Exam; and

- 3.3.2.2. Training for Prescriptive Authority Prescribing.

- 3.3.3. The Registrar may waive continuing education requirements.

Pharmaceutical Information Program (PIP)

[PIP](#) allows access to a patient's medication history, which is vital in making clinical decisions for health care professionals. Depending on practice site, temporary registrants may need to have an active PIP account before they can practise and are encouraged to take any necessary [training](#) to [register](#) or reactive their accounts.

4. Terms and Conditions of Practice

- 4.1. **Scope of Practice** – All pharmacists with a temporary practising licence may practise to the full-scope within the prerequisite training for prescriptive authority, minor ailments, and administration by injections, subject to the removal of conditions on their temporary licence.

Removing Conditions, A and M Licence Restrictions

Temporary Practising Licences will be issued with both conditions "A" and "M" assigned to indicate they are not certified to administer drugs by advanced methods or prescribe minor ailments respectively.

Removals of conditions will be reviewed on a case-by-case basis by SCPP, however:

- Temporary registrants may apply to have the condition "M" removed if they have prescribed [minor ailments](#) regularly in their prior practice and self-assessed they are still competent, or if they have taken the required medSask training.
- Condition "A" will not be removed unless the registrant has recently administered drugs by advanced methods within the last year and self-assessed they are still competent or have recently completed the training to administer drugs by advanced methods. Standard First Aid and CPR Level C with AED must be current.

- 4.2. **Supervision** - The temporary-licensed pharmacy professional must be supervised by a licensed pharmacist, within the following requirements, unless waived under extreme conditions at the discretion of the Registrar:

- 4.2.1. Supervisor is physically present or observing remotely through virtual means;
- 4.2.2. Supervisor is available to answer questions and provide support when requested; and.
- 4.2.3. Supervised until the responsible supervising licensed pharmacist is satisfied that the temporary licensed pharmacist can work alone.

Supervision Requirements for Temporary Practising Licensees

Supervision requirements for temporary practising licences vary by the membership category reinstated, the length of time out of practice and whether they practised in Saskatchewan or another jurisdiction. This includes:

- **Non-Practising, Associate, Retired and Lapsed with less than 3 years out of practice** - Required until responsible supervising licensed pharmacist is satisfied that this pharmacist can work alone. Supervision may be direct or done virtually.
- **Practising member in other Canadian jurisdiction in good standing** - Recommended orientation around the operations of the pharmacy. Direct supervision not required.

*New - Extended Internship Category

As of April 2020, the College extended the internship category to include graduates from a pharmacy degree program who had not yet successfully completed the entry-to-practice requirements (i.e. PEBC exams), rather than issuing a Conditional Practising license.

This means that the U of S class of 2020 and onwards, who have not yet completed their entry-to-practice requirements will be included in the internship category (with 4th year students of a pharmacy degree program).

- **Supervision Requirements** - Same as requirements for 4th year pharmacy students. See [SCPP Supervision of Pharmacy Interns](#)
- **Malpractice Insurance** - Covered under the supervising pharmacist's malpractice insurance
- **Scope of Practice** - For the purposes of emergency licensure, will be allowed to take AMC training as directed by Registrar.

Supervision Requirements for Grandfathered Conditional Practising Members – (in effect until July 31, 2021)

Grandfathered Conditional Practising members require supervision until the responsible supervising licensed pharmacist is satisfied that this pharmacist can work alone. Supervision may be direct or done virtually.

A "Conditional Licensee" practising alone is NOT practising independently because another pharmacist accepts responsibility for their actions. See SCPP [Conditional Licensure Guidelines for Conditional Licensees and Supervising Pharmacists](#).

4.3. **Other privileges** – Pharmacy professionals holding a temporary practising licence may not:

4.3.1. Be named as a pharmacy manager;

4.3.2. Purchase or sign for drugs in the schedules of the Controlled Drugs and Substances Act (CDSA); and

4.3.3. Nominate, vote or hold office with the College.

4.4. **Length of Membership** - A temporary practising licence is valid for the period of the declared emergency as determined by the Registrar.