



Feedback Received & SCPP Response – Conditional Licences versus Extended Internships

The Saskatchewan College of Pharmacy Professionals (SCPP) has received numerous questions about the new processes for extended interns. We appreciate members and students reaching out with questions and concerns and we hear you. The content below is intended to ensure the information we are all working with is correct and factual.

Feedback received: Other graduating health care professionals are being fast-tracked into practice.

- Information from the National Association of Pharmacy Regulatory Authorities (NAPRA) and the Network of Interprofessional Regulatory Organizations (NIRO) indicates that the licensure and supervision requirements for graduating professionals remain as before. All members and interns are encouraged to check the [NAPRA](#) website for accurate information on what each individual PRA is doing with 4th year graduating students and emergency licensure of retired, associate and non-practising members.
- Several comments indicated that The Saskatchewan Registered Nurses Association was fast tracking their grad nurses - SCPP has confirmed that graduate nurses require supervision and cannot work alone.

Feedback received: Graduating with a recognized degree in pharmacy qualifies a person to practice pharmacy.

- There are three requirements for a licence to practise pharmacy after graduating from the University of Saskatchewan (U of S):
 - Convocation with a Bachelor of Science in Pharmacy (Doctor of Pharmacy as of next year) from the U of S. This includes completion of the required Prescriptive Authority courses, the SPEP program and whatever other requirements are dictated by the College of Pharmacy and Nutrition. Proof of your convocation is supplied to SCPP by the College of Pharmacy and Nutrition.
 - Successful completion of the Pharmacy Examining Board of Canada (PEBC) Qualification Exam, both Part I (MCQ) and Part II (OSCE). Acceptable proof of this is a copy of the letter the candidate receives from the PEBC confirming this designation.
 - Completion of the prescribed membership and registration online application form, which includes declaration of acceptable malpractice insurance for the duration of the membership year being applied for, a current Criminal Record Check, as well as the applicable registration and membership fees.

- These requirements protect the integrity of the profession of pharmacy, ensure the public that a pharmacist is qualified and has met the entry to practice competencies, and ensure that a new graduates career commences with a strong foundation.

Feedback received: Pharmacies are understaffed and overworked due to the COVID-19 pandemic – it makes more sense to fast-track the graduates into the workplace.

- The extended internship category does not affect the length of time it takes for a graduate to enter the workplace. Extended interns may work to their full scope of practice under supervision by a licensed pharmacist (not including final sign-off for prescriptions).

Feedback received: The PEBC examinations are optional and not required as proof of entry to practise competency.

- Public safety is always SPCP's primary objective. The PEBC examinations assess an applicant's entry-level competence (knowledge, skills, and abilities) to practise pharmacy safely and effectively. The PEBC exams are based on the practice competencies in NAPRA's [Professional Competencies for Canadian Pharmacists at Entry to Practice](#), and are the gold standard for licensure to practise pharmacy in Canada. In response to a pan-Canadian petition of pharmacy students, PEBC has released a statement along with some FAQs. Please see the [PEBC website](#) for more details.
- All regulatory bodies for health care and other professions (e.g. engineering, accounting) must complete national entry to practise examinations as an assessment of competency prior to obtaining licensure.

Feedback received: Interns are less likely to be hired than conditional licensees.

- Extended interns may work to their full scope of practice under supervision by a licensed pharmacist (not including final sign-off for prescriptions). Both interns and the previous conditional licence category carry [supervision requirements](#). Please find more information [here](#) and [here](#).

Feedback received: Student loans will be negatively affected by graduates only earning an intern-level salary.

- The Government of Saskatchewan deferred student loan payments for six months effective March 30, 2020.
- Interns will not have to pay licensing and registration fees with SPCP or membership/malpractice insurance with PAS until they have passed the PEBC exams and are ready to register and become licensed as pharmacists.

Feedback received: The change in conditional licensure came as a result of students not being able to formally complete the third block of the Structured Practical Experiential Program (SPEP).

- The change to conditional licensure was already being examined by the SCPP Registration and Licensing Committee and Council prior to COVID-19 with the intent to be in force for the end of 2020 due to longstanding issues with the membership category. Unfortunately, and out of SCPP's control, this was expedited due to:
 - the COVID-19 pandemic;
 - the fact that students would not be able to complete the PEBC qualifying examinations until November, as currently scheduled;
 - change to the SPEP rotations, and the inability to complete the comprehensive exam that qualified previous candidates for conditional licensure; and
 - the practice environment during COVID-19 has significantly changed with new pressures and stresses that Council felt would be unsafe for a new graduate to enter practice unsupervised until they could complete all the licensing requirements. Meaning, even if the conditional licensure category would have continued this licence year, direct supervision would have been required.

Feedback received: Hospitals will struggle without conditional licensed pharmacists.

- The new process mirrors the Saskatchewan Health Authority's (SHA) residency approach to mentoring new graduates, although it adds an extra few months of direct supervision. The SHA has expressed appreciation for the added benefit of out-of-province graduates being able to register as interns immediately, as the previous conditional licensure process was only available for U of S students.

Feedback received: Graduates are ready to practise pharmacy alone in the current environment.

- Pharmacists are being asked to make more judgment calls and ethical decisions than ever before; regulatory barriers have been removed with further responsibility and accountability, in addition to managing drug shortages, reduced access to other health care providers and increased pharmacy stresses during the pandemic. The current practice environment is not an ideal environment in which to expect a new graduate that has not completed all the entry to practice requirements, to practise without direct supervision.
- SCPP has received numerous calls and emails from experienced members trying to navigate all the changes due to the COVID-19 pandemic and the increased stress within the pharmacy.

- SCPP Council approved emergency bylaws to ensure SCPP is able to make decisions in the best interest of the public and to be able to use a risk versus benefit approach should the situation with COVID-19 change. COVID-19 is an ever-evolving landscape and as regulators our decisions must be grounded in safety and risk management and our new emergency bylaws and policy framework enable SCPP to take this sound approach.

Feedback received: The health care labour force during the COVID-19 pandemic will be negatively affected by the lack of conditional licensing.

- SCPP has removed significant barriers to health care for Saskatchewan residents while upholding its mandate of public protection. To assist in meeting the demands of the COVID-19 pandemic, SCPP has:
 - Opened applications for expedited, no-fee temporary emergency licensure for retired and non-practising members to re-enter the workforce if they meet SCPP's competency requirements which are similar to all the other health regulators in Saskatchewan and across Canada;
 - Provided graduate interns with the authority to administer vaccinations or other necessary medications by injection once they have completed the necessary training requirements;
 - Worked with Health Canada to enable a [section 56 exemption for CDSA drugs](#) to ensure patients have access to required therapies;
 - Enabled phone and virtual pharmacy services through the Pexip program;
 - Enabled the emergency provisions of [Part K of the Bylaws](#) to allow the continuation of Schedule I prescriptions beyond the normal bylaws;
 - Continued to work with CPSS and SRNA to streamline and support OAT on a provincial level; and
 - Continued to work on keeping the [SCPP COVID-19 webpage](#) up to date with important resources and practice information.