



ONTARIO
PHARMACISTS
ASSOCIATION

Office of the Chief Executive Officer

November 22, 2018

Ms. Nancy Lum-Wilson
CEO and Registrar
Ontario College of Pharmacists
483 Huron Street
Toronto, ON M5R 2R4

Via Email: consultations@ocpinfo.com

Dear Ms. Lum-Wilson:

Re: Consultation on the Proposed Fee Increases and Bylaw Amendments

On behalf of the Board of Directors and members of the Ontario Pharmacists Association ('OPA', the 'Association'), we appreciate the opportunity to provide the Ontario College of Pharmacists ('OCP', the 'College') with commentary on the proposal to increase fees for all registrants and pharmacies which, if approved, would take effect on January 1, 2019.

In its consultation document, the College has stated that, "[t]he fee increase [for registrants and pharmacies] is required during a time of rapid change, evolving public expectations and increased regulatory activities." As the representative voice of its members, we at the OPA agree, but also acknowledge that these very same pressures have taken a very large economic toll on the profession, and we are looking to the College to recognize these fiscal pressures facing pharmacy professionals and their employers.

Over the past several years, we have witnessed the operational impacts of government-initiated reductions to pharmacy funding (particularly since 2015) and the continual downward pressures on pharmacy margins stemming from the pan-Canadian Pharmaceutical Alliance initiative. Pharmacists and technicians have borne the brunt of these workplace challenges. And notwithstanding evolving (and growing) expectations from the public, these pharmacy professionals are experiencing a significant decline in real wages while the workload remains the same, if not increased – essentially, we have a case of doing more work for less money. It is with this mindset that **OPA strongly recommends that the College adjust the very large and rapid increase of 12.5% in registrant fees for both 2019 and 2020 and to apply a multi-year phased-in approach to these increases** to soften the blow to pharmacy professionals. It is more respectful of the challenges faced by a very busy and overworked group of pharmacists and technicians.

Finally, OPA is requesting that the Ontario College of Pharmacists reconsider the large and unbalanced hospital renewal fee and its proposed 25% increase. Based on OCP's recent experience in assessing hospital practice sites, it should be very clear that not all hospitals are the same in terms of their size, their budget and their staffing load. A single flat rate for all hospitals is clearly disadvantageous for smaller, rural hospitals that do not have nearly the same level of resources or operational supports as do the larger, urban centre and teaching hospitals, such as the University Health Network. Accordingly, **OPA strongly recommends a differential (i.e., reduced) fee that respects the budgetary and operational challenges of Ontario's smaller and/or rural hospital pharmacies.**



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The Ontario Pharmacists Association appreciates the opportunity to provide the College with its recommendations for a more phased-in and protracted escalation in registrant and pharmacy fees, as well as a realigning of fees for hospital pharmacies that better respects their size, rurality and budgetary challenges. OPA recognizes the increased costs faced by the College to deliver on its mandate to protect the public but asks that it also acknowledge the very real economic and personal pressures facing frontline pharmacy professionals in a growing pharmacy marketplace.

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

Yours sincerely,

Bill Wilson
Interim CEO

cc: Mr. Mike Cavanagh, Chair, Ontario Pharmacists Association
Ms. Jen Baker, Vice Chair, Ontario Pharmacists Association
Mr. Allan Malek, EVP and Chief Pharmacy Officer, Ontario Pharmacists Association