NOVA SCOTIA
Labour, Skills and Immigration

December 11, 2024

To: ***Nova Scotia College of Pharmacists***

Thank you for submitting the FRPA Review Report (appended below), which was received by this office on December 10, 2024, in fulfillment of the requirements of Section 16 of the *Fair Registration Practices Act* (FRPA). Any statistical information provided through the annual FRPA survey and as published in the FRPA Annual Report, which can be found on the FRPA website, has been accepted as forming part of this report.

This letter pertains only to the *Nova Scotia College of Pharmacists'* (NSCP) compliance status with the FRPA. It does not speak to the compliance status with the *Canadian Free Trade Agreement*, the *Canadian Free Trade Agreement Implementation Act*, or any other enactment.

Upon review of this report, including information found through links contained within, no FRPA compliance issues were identified with the registration practices of the *Nova Scotia College of Pharmacists*. Therefore, no further follow-up is required in relation to this FRPA review report.

Pursuant to Section 16, the next FRPA review report is due on or before **December 10, 2029**, which is five years from the date the most recent report was received.

Thank you for your cooperation, and compliance with the FRPA, which helps to ensure fair access to Nova Scotia's labour force of regulated professions.

Sincerely,

F. Reinhardt

Frank Reinhardt, Review Officer, Fair Registration Practices Act
Department of Labour, Skills and Immigration

# Nova Scotia College of Pharmacists

## Report on Registration Practices under Nova Scotia's

*Fair Registration Practices Act* (FRPA)

December 10, 2024

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# 1. Requirement and Purpose of this Report under the FRPA:

This report has been submitted to the *"Review Officer"*, appointed under Section 13 of the *Fair Registration Practices Act* (FRPA or "the Act"), in fulfillment of the requirements of Section 16 of the Act, which states, in part that:

> ***16(2) Every regulating body shall review its registration practices in accordance with this Section and shall file a report on the results of the review with the Review Officer…(8) every five years …unless the Review Officer, based on an assessment of the information provided in a report, specifies a more frequent reporting…***

Section 6 of the Act summarizes the ***"Duty"*** of each "regulating body" as:

> ***A regulating body has a duty to carry out registration practices that are transparent, objective, impartial and procedurally fair.***

Sections 5 to 12 of the Act, formally referred to as the *"Fair Registration Practices Code"*, details the specific legislative requirements that must me met in fulfillment of this ***"duty"***. This FRPA review report, which is subject to review by the FRPA *"Review Officer"*, details the registration practices of this regulating body in relation to those specific requirements and others detailed under Section 16.

# 2. Overview of the Regulating Body:

| | |
|---|---|
| Name of Regulating Body: | **Nova Scotia College of Pharmacists**<br>In this report, "regulating body" refers to this organization. |
| Homepage of Regulating Body: | https://www.nspharmacists.ca/ |
| List of Occupations Regulated by the Regulating Body and that are being reported on in this report: | Pharmacist<br>**Pharmacy Technician** |
| List of types of Licences / Certificates / Registrations Issued (eg. Full, Conditional, Temporary, Student) by the Regulating Body: | **Pharmacist – Practicing Direct Patient Care**<br>Pharmacist – Practicing Indirect Patient Care<br>**Pharmacist – Non-practicing**<br>**Pharmacy Intern**<br>**Pharmacy Student**<br>**Pharmacy Technician – Practicing Direct Patient Care**<br>**Pharmacy Technician – Non-practicing**<br>**Pharmacy Technician Candidate**<br>**Community Pharmacies** |
| Name of the authorizing legislation (include link(s)): | https://www.nspharmacists.ca/?page=legislationandregulations |

The following information is accessible through the Regulating Body's home page **(Yes/No)**:

- The role of the regulating body.
- Descriptions of the occupations and licence types listed above.

**YES**

**If no,** please provide that information here:

The information is available on the website for licenses and registrations that practice direct patient care. Practicing indirect patient care and non-practicing statuses are not available upon initial application. They are available to individuals who choose or who no longer satisfy the requirements to maintain a direct patient

care license. Information about changing status is sent to all registrants annually.

# 3. Reporting on Registration Practices:

This report has been submitted using a template provided by the FRPA *"Review Officer"*.

This Section details the registration practices of this regulating body in relation to the requirements under the Act for all three applicant types:

> ***"New"*** applicants: *Those who only include Canadian credentials in their application to apply for registration (licensure) and are not currently registered (licensed) to practice anywhere in Canada.*
>
> ***"Interprovincial"*** applicants: *Those who are currently registered (licensed) to practice elsewhere in Canada (outside of Nova Scotia); and*
>
> ***"International"*** applicants: *Those who are including international credentials in their application to apply for registration (licensure) and are not currently registered (licensed) to practice anywhere in Canada.*

## 3.1 Registration Process – Requirements, Criteria Communications:

| **Sections of FRPA:** 7, 9(a) and 16<br>Indicate which of the following aspects of the registration process is described ***"in a clear and understandable form"*** on, or accessible through, the regulating body's website, including any differences, if any, for each applicant type ("New", "Interprovincial" and "International"): | **YES / NO** |
|---|---|
| a) The step-by-step process that applicants must follow to apply for registration. [***Sections 16(3)(a), 7(a) and (c)***] | **YES** |
| b) *"Requirements for registration"* (including qualifications and required documentation) [***Sections 16(3)(a) and (c), 7(c), 9(a***)] | **YES** |
| c) *"the criteria used to assess whether the requirements for registration have been met"* [***Sections 16(3)(b), 7(d***)]; | **YES** |
| d) *"the fees charged for registration"* (if any) [(***Sections 16(3)(d),7(f***)]; | **YES** |
| e) *"information about the length of time that the registration process for that regulating body usually takes"* [***Sections 16(3)(l), 7(b)***]; | **NO** |

For each item above, for which the answer is **"YES",** the FRPA Review Officer will review the regulating body's website to confirm compliance with the above cited FRPA sections.

For each item above for which the answer is **"NO"** (if any), in order to determine compliance with the cited FRPA sections, please provide a description of that item in the space provided below as well as a description of how this information is (or is not) provided to the unidentified individuals who only ***"…intend to apply for registration"*** (e.g. How it is made available to the public):

E) Information regarding the length of time that the registrations process takes from receipt of a completed application for registration and/or licensure is communicated directly to applicants via an auto-reply email that is regularly updated to reflect current timelines.

## 3.2 Communicating Registration Decisions:

| **Sections of FRPA:** 8, 10(1)<br>For each of the following statements, indicate whether, or not, it accurately describes the registration practices of the regulating body ('Yes' or 'No'). | **Accurate? (YES/NO)** |
|---|---|
| a) Where registration **is granted**, written confirmation is provided to applicants within a reasonable time. | **YES** |
| b) Where registration **is not granted**, the regulating body: | |
| • provides written decisions that include reasons to applicants within a reasonable time respecting registration decisions; | **YES** |
| • provides, if/where practical, information respecting measures or programs that may be available to assist unsuccessful applicants in obtaining registration at a later date; and | **YES** |
| • informs the applicant of the internal review process and of the procedures and time frames for the internal review. | **YES** |
| c) (Optional) Please use the space below to provide any further details as/if necessary:<br>Click or tap here to enter text. | |

## 3.3 Allowance for Alternative Information

| **Sections of FRPA:** 7(c), 8(a), 9 and 16(3)(a), (c) and (g)<br><br>**Note:** FRPA compliance does not require that a regulating body accept "alternative information". It requires that, if there are such policies (there exists some known circumstances where alternative information may be considered), that such policies be communicated to applicants and unidentified **"potential applicants"** (e.g. by making the information publicly available). | **(YES/NO)** |
|---|---|
| a) ***"Where documentation cannot be obtained by an applicant for reasons beyond the applicant's control…",*** does there exist any ***"…alternative information*** [which] ***may be supplied by the applicant that may be acceptable to the regulating body?*** | **YES** |
| b) **If 'Yes'** to part **'(a)', and** these "alternative information" policies, **are** detailed on the regulating body's website, including what alternative information may be acceptable, and under what circumstances, please provide the direct weblink in the space provided below:<br><br>https://www.nspharmacists.ca/wp-content/uploads/2022/06/POLICY_Accepting_Alternative_Documentation.pdf | |
| c) **If 'Yes'** to part **'(a)'**, **and** these "alternative information" policies **are not** detailed on the regulating body's website, in the space provided below, please detail these "alternative information" policies, including what alternative information may be acceptable, under what circumstances, and how this information is (or is not) provided to the unidentified individuals who only ***"…intend to apply for registration"*** (e.g. How it is made available to the public) (Section 7c):<br><br>Click or tap here to enter text. | |
| d) If an applicant informs the regulating body that they are unable to provide the standard required information or documentation, and the Regulating Body determines that there is no acceptable "alternative information", does the regulating body inform the applicant of this ***"within a reasonable time"***? | **YES** |
| a) (Optional) Please use the space below to provide any further details as/if necessary:<br><br>Click or tap here to enter text. | |

## 3.4 Accommodation Policies for Applicants with A Physical or Mental Disability

**Sections of FRPA:** 7(e), 8(a) and 16(3)(h)

**Note:** FRPA compliance does not require that a regulating body provide accommodations for applicants with disabilities. It requires that, if there are such policies (there exists some known circumstances where accommodations may be provided), that such policies be communicated to applicants and unidentified individuals who are only ***"intending to apply"*** (e.g. by making the information publicly available). It also requires that any requests for accommodations be responded to in a timely manner (whether granted or not).

Indicate whether, or not, the following statements accurately describes the registration practices of the regulating body ('Yes' or 'No').

| | **Accurate? (YES/NO)** |
|---|---|
| ***a)*** ***"A description of existing accommodation policies for applicants with a physical disability or mental disability"*** is accessible ***"in a clear and understandable form"*** on, or through, the regulating body's website. | **YES** |

If **'Yes'**, please provide a weblink to this description in the space provided below (then skip to the next question, 3.5):

https://www.nspharmacists.ca/wp-content/uploads/2022/06/POLICY_Accommodation_JP_Exam.pdf

If **'No'**, indicate which of the following (b, c, or d) accurately describes this regulating body's registration practices:

| | |
|---|---|
| ***b)*** Although no formal ***"accommodation policies"*** exist, the regulating body considers, and provides timely responses to, any request from an applicant, or potential applicant, for accommodations for a disability (physical or mental). Such responses would detail any accommodations that may be provided (if any) and reasons for any specific requests not granted. | select |
| ***c)*** No accommodations for physical or mental disabilities are currently offered under any circumstances by the regulating body. Any applicant who requests such accommodations are informed of this in a timely manner. | select |
| ***d)*** The regulating body has policies related to accommodations for applicants with a physical or mental disability that are different than those described in parts 'b' and 'c'. However, descriptions of these policies are **not** posted on the regulating body's website. | select |

**If yes**, in the space provided below, please provide ***"a description of existing accommodation policies for applicants with a physical disability or mental disability"*** and describe how the regulating body provides this information to the unidentified individuals who only ***"…intend to apply for registration"*** (e.g. How it is made available to the public):

Click or tap here to enter text.

## 3.5 Other Support Provided to Applicants During the Registration Process

| **Sections of FRPA:** 7(e) and 16(3)(k) | **Accurate? (YES/NO)** |
|---|---|
| For the following statement, indicate whether, or not, it accurately describes the registration practices of the regulating body ('Yes' or 'No'):<br>a) The regulating body's website informs applicants that general support (e.g. to answer questions they may have about the registration process or requirements) is available upon request throughout the registration process by using the contact information provided on the website. | **YES** |

b) If there are any other supports available to applicants (which have not already been described within this template), in the space provided below, please list those supports and, for each, **either:** 1) provide a direct weblink to its description; **or** 2) provide that description including how this information is (or is not) provided to the unidentified individuals who only ***"…intend to apply for registration"*** (e.g. How it is made available to the public):

https://rxns.ca/inquire/
https://isans.ca/
https://www.pharmacistsgatewaycanada.ca/

## 3.6 Role of Third-Party Assessors

| **Sections of FRPA:** 16(3)(i)<br>A **"third-party assessor"** is defined in the Act as: ***"a body external to a regulating body relied on by the regulating body to assess the equivalence of the qualifications of an applicant for registration."*** | **YES/NO** |
|---|---|
| Are **"third-party assessors"** involved in the registration process? | **YES** |

**<u>If yes</u>,** compliance with the Section 16(3)(i) of the FRPA requires that ***"an outline of the role of third-party assessors"*** be provided. Therefore, in the space provided below, please provide that outline/description or, if this is described on the regulating body's website, provide a weblink to this information:

https://pebc.ca/pharmacists/document-evaluation/general-information/
Additionally, the NSCP receives a list of all successful candidates of the Pharmacy Examining Board of Canada examinations directly from PEBC.

## 3.7 Access to Registration Records

| **Sections of FRPA:** Sections 12 and 16(3)(j). | **Accurate? (YES/NO)** |
|---|---|
| For the following statement, indicate whether, or not, it accurately describes the registration practices of the regulating body ('Yes' or 'No'):<br><br>***"Upon the written request from an applicant, …the regulating body …provides the applicant with access to*** [any and all] ***records held by it that are related to the application***, other than any records or portions of records (if any) that Section 12 of the FRPA specifically permits regulating bodies to refuse to provide (eg. those protected by legal privilege or other existing legislation or to protect the identities of other individuals, or to avoid negative impacts on public safety or the integrity of the registration process). | **YES** |

In the space provided below, please provide **either**: a description; **or** a link to a *"description of the process under which requests for access to records are considered"*; **or** both if/as deemed necessary.

https://www.nspharmacists.ca/wp-content/uploads/2022/06/POLICY_Access_to_Records.pdf

## 3.8 Internal Review Process

| **Sections of FRPA:** 7(a), 8(a), 10, 16(3)(m) and (n)<br>For each of the following statements, indicate whether, or not, it accurately describes the registration practices of the regulating body ('Yes' or 'No'). | **Accurate? (YES/NO)** |
|---|---|
| a) An "***internal review process***", is available to unsuccessful applicants to appeal their registration decision. | **YES** |
| b) The internal review process includes the following features: | |
| • Applicants appealing a registration decision are provided an opportunity to provide new information and to make submissions with respect to an internal review in such a manner as determined by the internal review decisionmaker. | **YES** |
| • An internal review decision-maker provides applicants with a written decision that includes reasons within a reasonable time. | **YES** |
| • No one who acted as a decision-maker in respect of a registration decision may act as a decision-maker in an internal review in respect of that registration decision. | **YES** |
| c) ***"A description of the internal review process"*** is accessible ***"in a clear and understandable form"*** on the regulating body's website. | **YES** |

**If yes**, in the space provided below, please provide a link to this description and the FRPA Review Officer will review to confirm compliance with the cited FRPA sections:

https://www.nspharmacists.ca/wp-content/uploads/2022/06/POLICY_Registration_Application_Appeals.pdf

**If no**, in the space provided below, please provide ***"a description of the internal review process"*** and describe how the regulating body provides this information to the unidentified individuals who only ***"…intend to apply for registration"*** (e.g. How it is made available to the public):

Click or tap here to enter text.

## 3.9 Training for Internal Reviewers

| **Sections of FRPA:** 11, 16(3)(p) | **Accurate? (YES/NO)** |
|---|---|
| a) The regulating body ensures that any individuals acting as decisionmakers in internal reviews receive training on conducting an internal review and that training includes the following features:<br>• Structured/formalized (expectations are clearly defined);<br>• Specific to the process of conducting an internal review; and<br>• Includes a means of verifying that the training was "received" (eg. attendance tracking, signed declarations by trainees and/or some form of course assessment such as a test or assignment). | **YES** |

b) In the space provided below, please describe the training provided to individuals who make internal review decisions, including the three required features noted in part 'a' above. Alternatively, if this description happens to be available on or through the regulating body's website (not required), you may provide a link to this description:

We have never had an appeal and so we would be unable to maintain the currency of a committee's training in the absence of the opportunity to apply the skills. As such, our strategy to respond to a potential appeal continues to be making use of an arrangement through the Nova Scotia Regulated Health Professions Network to draw upon the trained committee members of other regulators who have been specifically trained and who have the opportunity to maintain their competencies through their ongoing work with regulators who have active appeal committees.

## 3.10 "Interprovincial" Applicants under the Canadian Free Trade Agreement (CFTA):

**Sections of FRPA:** 3, 7, and 16(3)

**Context:**
Section 3 of the FRPA ***"…recognizes the commitments …made under the Canadian Free Trade Agreement*** (CFTA)***…"*** and Section 16 requires that the registration practices of this regulating body, for all applicants, including "Interprovincial" applicants, be detailed in this FRPA review report.

Nova Scotia's *Canadian Free Trade Agreement Implementation Act* requires that regulating bodies comply with Chapter Seven, *"Labour Mobility"*, of the CFTA.

This Section reports on the regulating body's registration practices for "Interprovincial Applicants" as they relate to Chapter 7 (Labour Mobility) of the CFTA.

**Instructions:**
Indicate which of the following documents/items are required from Interprovincial Applicants before registration (licensure) may be granted. (**For each item, answer either 'Yes' or 'No'. Do not leave blank.**):

> **Note:** Items 'a' to 'c' are specifically permitted under Article 705 the CFTA. Items 3d to 3j are also permitted but only if they ***"…are the same as, or substantially similar to, but no more onerous than, those imposed by the regulatory authority on its own workers as part of the normal certification process; and …the requirement does not create a disguised restriction on labour mobility"***.

| **Sections of FRPA:** 3 and 16(3)<br>Indicate whether, or not, each of the following items are required of interprovincial applicants before registration may be granted (Yes or No): | **Required? (YES/NO)** |
|---|---|
| a) An application form. | **YES** |
| b) Proof of current licensure in one or more Canadian jurisdictions (outside of Nova Scotia), for the same occupation, for which the applicant is applying. | **YES** |
| c) A certificate, letter, or other evidence from the regulatory authority (or authorities) that issued the applicant's current license, confirming that their current license is in good standing. | **YES** |
| d) Any items that are referred to as ***"Exceptions to Labour Mobility"*** to satisfy one or more ***"Legitimate Objectives"***, or (**LOEs - *"Legitimate Objective Exceptions")*** which are approved by the Province of Nova Scotia and listed here: https://workersmobility.ca/exceptions-by-jurisdiction/ (Click on Nova Scotia – if none are relevant, chose "no" ) | **NO** |
| e) an application or processing fee. | **YES** |
| f) insurance, malpractice coverage, or similar protection | **YES** |
| g) requirement to post a bond. | **NO** |
| h) a criminal background check. | **YES** |
| i) evidence of good character (besides any item already listed above).<br>**If yes,** please provide a brief description: | **YES** |

Completed self disclosures on the NSCP Statement of Disclosure Form.
https://www.nspharmacists.ca/wp-content/uploads/2015/07/Form_StatementOfDisclosure.pdf

j) demonstrated knowledge of measures maintained by Nova Scotia to practice the occupation in Nova Scotia (eg. jurisprudence exam)

**YES**

**If yes,** please provide a brief description:

This exam is designed to assess an applicant's knowledge and understanding of the rules that impact pharmacy practice in the province. It is not intended that applicants memorize the material; however, they must be able to interpret and apply the pertinent legal requirements and procedures to be followed when practising in Nova Scotia.

k) demonstrated proficiency in either English or French for at least some interprovincial applicants:

**YES**

**If yes,** is this only required **if** no equivalent language proficiency requirement was imposed on, and satisfied by, the worker as a condition of the worker's certification in his or her current certifying jurisdiction?

**YES**

l) Any other document(s)/item(s), not covered by the above categories (items 'a' to 'k') (eg. proof of education or other credentials or additional training requirements):

**NO**

**If yes,** list these items in the space provided below, the criteria used to assess them, and describe why current licensure from another Canadian jurisdiction is not accepted as confirmation of meeting these criteria:

Click or tap here to enter text.

m) If you answered **'Yes'** to any of the items from **'e'** to **'k'**, are all of those items ***"…the same as, or substantially similar to, but no more onerous than, those imposed…"*** on "New" applicants (unlicensed with only Canadian credentials)?

**YES**

**If no (or "Not Sure"),** please list each item, from **'e'** to **'k'**, that are, or may, not be ***"…the same as, or substantially similar to…"*** those imposed on non-CFTA applicants and describe those differences:

Click or tap here to enter text.

# 4. Declaration by Regulating Body:

The *Regulatory Body* hereby declares that the information contained in this report, including any information provided through weblinks contained in this report, is a true and accurate representation of its current registration practices.

**SIGNATURE OF THE AUTHORIZED MEMBER OF THE REGULATING BODY:**

**Name (print): ___Leah Hutt_____**

**DATE: 2024-12-10**